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LAND AND CHEMICALS DIVISION

Type of Document: NOV

Name of Document: MPI NOV

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>CINDY DABNER</u>	<u>24 MV 2014</u>
SECTION APA:		
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BRANCH APA:		
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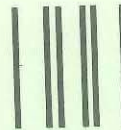
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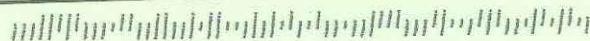


Cindy Dabner
U.S. EPA / Region 5 / LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

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DEC 29 2014

AND CHEMICALS DIVISION
U.S. EPA - REGION 5



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- Attach this card to the back of the mailpiece, or on the front if space permits.

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|||||
Mr. Richard Granberg / EH&S Comp-Officer
MPI Research
54943 North Main Street
Mattawan, Michigan 49071

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X

Randy Hoener

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

Randy Hoener

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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DEC 23 2014

REPLY TO THE ATTENTION OF:

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RETURN RECEIPT REQUESTED

Mr. Richard Granberg
Safety, Health and Environmental Compliance Officer
MPI Research
54943 North Main Street
Mattawan, Michigan 49071

Re: Notice of Violation
Compliance Evaluation Inspection
MID 048 989 891

Dear Mr. Granberg:

On May 15, 2013 a representative of the U.S. Environmental Protection Agency inspected the MPI Research facility located in Mattawan, Michigan. As a large quantity generator of hazardous waste, MPI Research is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate MPI Research's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by MPI Research, EPA's review of records pertaining to MPI, and the inspector's observations, EPA has determined that MPI has unlawfully stored hazardous waste without a license or interim status as a result of MPI's failure to comply with certain conditions for a license exemption under Mich. Admin. Code. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which MPI Research was out of compliance at the time of the inspection in paragraphs 1- 6, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 1-6 are also

independent TSD requirements incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q). Accordingly, each failure of MPI Research to comply with these conditions is also a violation of the corresponding requirement in Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) [40 C.F.R. Part 265].

At the time of the inspection, MPI Research was out of compliance with the following large quantity generator license exemption conditions:

1. Date When Each Period of Accumulation Begins

Under MAC R. 299.9306(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, MPI Research maintained containers that were not marked with the date upon which each period of accumulation of hazardous waste began. Specifically, the inspector observed the following:

One 55-gallon drum located in the 90 Day Accumulation Area of the Drum Room marked as waste flammable solids, but not marked with the date upon which each period of accumulation of hazardous waste began and the hazardous waste codes;

Two 55 gallon drums located in the 90 Day Storage Area of the Drum Room one drum marked as a corrosive and the second drum marked as a hydrochloric acid corrosive, but not marked with the date upon which each period of accumulation of hazardous waste began and the hazardous waste codes; and

One 55-gallon plastic drum located in the 90 Day Storage Area of the Hazardous Waste Storage Building Drum Room was observed marked as a corrosive, but not marked with the date upon which each period of accumulation of hazardous waste began and the hazardous waste codes.

MPI Research, therefore, violated the above-reference storage container management requirement. However at the time of the inspection, facility personnel provided accumulation dates for each of the four containers mentioned above. Thus, no further action is necessary for the above-referenced requirement.

2. Hazardous Waste Container Labeling

Under MAC R. 299.9306(1)(c) also code of the waste, 299.9306(1)(b)[40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, MPI Research inappropriately managed the following containers:

Two 5-gallon containers located in the Satellite Accumulation Area (SSA) of Room M-

2514 of the Test Material Control Area (TMC) containing acetone was observed not marked as a hazardous waste with the hazardous waste codes;

One 55-gallon drum located in the Satellite Accumulation Area (SSA) of the Drum Room observed labeled as xylene/paraffin waste and a flammable solid, but not marked as a hazardous waste with the hazardous waste codes;

Two 55 gallon drums located in the 90 Day Storage Area of the Drum Room one drum marked as a corrosive and the second drum marked as a hydrochloric acid corrosive, but not marked as a hazardous waste with the hazardous waste codes; and

One 55 gallon drum located in the Less than 90 Day Storage Area of the Hazardous Waste Storage Building containing hydrochloric acid waste not marked as a hazardous waste with the hazardous waste codes.

MPI Research, therefore, violated the above-reference storage container management requirement. However at the time of the inspection, facility personnel provided hazardous waste labels were provided with the hazardous waste codes. Thus, no further action is necessary for the above-referenced requirement.

3. Contingency Plan and Emergency Procedures

Under MAC R. 299.9306(1)(d) [40 C.F.R. § 262.34(a)(4) and 265.52(c) and (d)], a large quantity generator contingency plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as an emergency coordinator (see § 265.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

Review of the MPI Research Emergency Action Plan did not show the name, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. MPI Research, therefore, failed to comply with the above-referenced contingency plan requirement.

4. Preparedness and Prevention

Under MAC R. 299.9306(1)(d) [40 C.F.R. § 265.37(a)&(b)], a large quantity generator must attempt to make arrangements as appropriate for the type of waste handled at the facility and the potential need for the services of local authorities.

At the time of the inspection, no coordination efforts between MPI Research and local emergency response agencies were available for review to documented arrangements made with local authorities. MPI Research, therefore, failed to comply with the above-referenced requirement.

5. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* MAC R. 299.9306(1) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* MAC R. 299.9306(1) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;
- 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and
- 4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* MAC R. 299.9306(1) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, MPI Research did not have the following:

- 1) A list of each position at the facility related to hazardous waste management and the name of the employee filling such position(s);
- 2) A written description for each position related to hazardous waste management at the facility; and
- 3) Training records for the following personnel:
 - a. Larry McKee – calendar year 2012
 - b. Richard Granberg – calendar year 2011 and 2013

While MPI Research provided training records on June 28, 2013 and April 23, 2014, training records were missing for the above-mentioned personnel for the respective years. MPI, therefore, failed to comply with the above-referenced training requirements.

6. Weekly Container Inspections

Under MAC R. 299.9306(1)(a)(i); 299.9614 [40 CFR §§ 262.34(a)(1)(i); 265.174], a

large quantity generator must inspect areas where hazardous waste containers are stored. Additionally, it is required that a large quantity generator document and maintain records of the inspections in an inspection log or summary for not less than three years from the date of the inspection. *See* MAC R. 299.9306(1)(a)(i).

At the time of the inspection, weekly inspection documentation was not provided for calendar years 2011, 2012, and 2013. MPI Research, therefore, failed to comply with the above-referenced weekly container inspection requirement. However on April 23, 2014, MPI Research provided a container inspection log for 2011, 2012, and 2013 to demonstrate compliance with the weekly inspection requirement. Thus, no further action is necessary for the above-referenced requirement.

Summary: By failing to comply with the conditions for a license exemption, above, MPI became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. MPI failed to apply for such a license. MPI's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

Based on information provided by MPI, EPA's review of records pertaining to MPI, and the inspector's observations, EPA has determined that MPI violated RCRA requirements related to hazardous waste determinations and universal waste, as described in paragraphs 7-8, below.

MPI Research violated the following generator requirements:

7. Hazardous Waste Determination

Under MAC R. 299.9302(1) [40 CFR § 262.11], a generator must determine whether its waste is hazardous. Additionally, a generator must keep records of any test results, waste analyses, or other determinations made for at least three years from the date that the waste was last sent for treatment, storage or disposal. *See* MAC R. 299.9307 [40 CFR § 262.40(c)].

At the time of the inspection, MPI Research did not maintain all hazardous waste determinations on-site for all the waste generated at the facility and provided incomplete hazardous waste determinations to review. The two hazardous waste determinations that were provided during the inspection were determined to be incomplete due to insufficient information. MPI Research, therefore, failed to comply with the above-referenced generator requirements. However, hazardous waste determinations were provided on June 28, 2013. Thus, no further action is necessary for the above-referenced requirement.

8. Universal Waste Requirement

MPI is a small quantity handler of universal waste because it accumulates 5,000 kilograms (11,000 lbs) or less of universal waste at any time.

Under MAC R. 299.9228(4)(c)(iv)[40 CFR § 273.14(e)], a small quantity handler of universal waste must label or clearly mark each lamp or a container or package in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

At the time of the inspection, MPI Research's containers of lamps were not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps." MPI Research, therefore, failed to comply with the above-referenced universal waste requirements. However, at the time of the inspection labels were placed on the lamp containers. Thus, no further action is necessary for the above-referenced requirement.

Under MAC R. 299.9228(4)(e)(i)[40 CFR § 273.13(d)(1)], a small quantity handler of universal waste must manage pharmaceutical universal waste in a manner to prevent release of universal waste or components of waste by containing the universal waste in structurally sound packaging that is compatible with contents, will prevent breakage and kept closed.

At the time of the inspection, one 55-gallon drum located in room M-2467 of the TMC was observed open. MPI Research, therefore, failed to comply with the above-referenced universal waste requirements. However, at the time of the drum was closed. Thus, no further action is necessary for the above-referenced requirement.

Under MAC R. 299.9228(4)(a)[40 CFR § 273.15(a)-(c)], a large small handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

- (1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
 - (2) Marking or labeling each individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received;
 - (3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received;
 - (4) Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;
 - (5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received;
- or

(6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

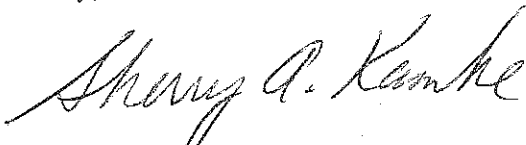
At the time of the inspection and following the inspection, MPI Research was unable to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or was received. MPI Research personnel provided a start date for the lamps, but an accumulation start date for the pharmaceutical waste was not provided. MPI Research, therefore, failed to comply with the above-referenced universal waste requirements.

At this time, EPA is not requiring MPI Research to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1 – 6, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 3, 4, 5, and 7. You should submit your response to Cindy Dabner U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.”

If you have any questions regarding this letter, please contact Cindy Dabner, of my staff, at dabner.cindy@epa.gov or 312-886-5890.

Sincerely,



for Gary J. Victorine, Chief
RCRA Branch

Enclosure

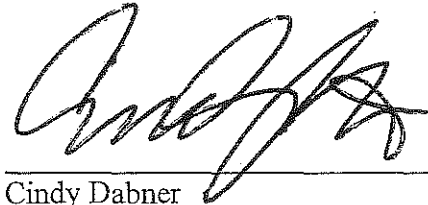
cc: Nadine Deak (deakn@michigan.gov)
John Craig (craigj@michigan.gov)
Lonnie Lee (leel@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR8J
77 WEST JACKSON BLVD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: MPI RESEARCH
EPA ID NUMBER: MID 048 989 891
ADDRESS: 54943 North Main Street, Mattawan, MI 49071
DATE OF INSPECTION: May 15, 2013
EPA INSPECTOR: Cindy Dabner
Environmental Scientist

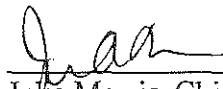
PREPARED BY:



Cindy Dabner
Compliance Section 2

Nov 13, 2014
Date

ACCEPTED BY:



Julie Morris, Chief,
Compliance Section 2

11/28/14
Date

Purpose of the Inspection

This inspection was an evaluation of MPI Research's compliance with hazardous waste regulations found at Michigan Administrative Code (MAC) and Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S.

Environmental Protection Agency Region 5 conducted the inspection. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a large quantity generator (LQG).

Participants

U.S. Environmental Protection Agency-

Cindy Dabner, U.S. EPA Inspector U.S. EPA Region 5

dabner.cindy@epa.gov

312-886-5890

Representatives of MPI Research-

Lisa B. Sexton, Manager, Safety, Health and Environmental Services

lisa.sexton@mpiresearch.com

269-668-3336 ext 1899

Richard Granberg, Senior, Safety, Health and Environmental Compliance Officer

richard.granberg@mpiresearch.com

269-998-3336 ext. 2050

Mary Ann Scott, Senior Director Regulatory Compliance

maryann.scott@mpiresearch.com

269-668-3336 ext. 1273

Introduction

On May 15, 2013, Inspector Dabner arrived to the site at approximately 9:15 a.m. After checking in at the front office, the inspector was directed to Mrs. Lisa Sexton, the Manager, Safety, Health and Environmental Services. Inspector Cindy Dabner presented her federal identification and explained the purpose of the visit was to conduct a hazardous waste inspection.

During the opening conference, Inspector Dabner inquired about the required safety measures to conduct during the inspection tour. Mrs. Sexton requested that Inspector Dabner wear shoe covers, a laboratory jacket, and a radiation meter device.

Inspector Dabner discussed during the opening conference, confidential business information (CBI) and the use of a camera during the inspection. MPI Research did not make any CBI claims on: (1) the information provided to the inspector; or (2) photographs taken during the inspection. Inspector Dabner provided a Small Business Resources information Sheet and Pollution Prevention Brochure to Mrs. Sexton.

Site Description

MPI Research, Inc. is located in a large compound on the east side of Main Street, immediately south of the I-94 interchange in the Village of Mattawan, Michigan. MPI Research is privately held and not publicly traded. The company engages in non-clinical evaluation of pharmaceuticals, medical devices and consumer products on a global level. The facility consists of a number of interconnected buildings totaling approximately one million square feet of offices, laboratories and support facilities. There are several large employee parking areas around the structures and three storm water retention ponds located on the site. The facility employs approximately 1100 employees and operates using two shifts of employees and a skeleton crew for third shift.

The bulk of the hazardous waste generated at the facility is from analytical instruments waste reagents. The main waste streams generated at MPI Research consist of the following: (1) acetone, methanol (D001 and F003); (2) paraffin, xylene (D001 and F003); (3) hydrochloric acid (D001); (4) potassium hydroxides (D001 and F003); (5) potassium hydroxide; (6) formaldehyde; (7) hydrochloric acid; (8) xylene, alcohol; and (9) waste oil. The facility also generates universal waste. The universal waste includes batteries and fluorescent lamps.

Site Tour

Ms. Sexton escorted the inspector during the site inspection tour. The tour started in the Analytical Area. In this area, a high performance liquid chromatographer (HPLC) is used to separate, identify, and quantify the components in a test article. Once the process is complete, the test articles are disposed of as hazardous waste and the glass pipette tips are accumulated in 55-gallon containers. The inspector observed a 55-gallon plastic drum serving in satellite accumulation area (SAA) of the Analytical Area. The 55-gallon drum was observed marked as hazardous waste with hazardous waste codes D001 and D003 along with the DOT shipping information and UN number. See Photograph #2 and #3.

In Room M-2116 of the Analytical Area, the inspector observed multiple containers ranging in various sizes amounting to approximately 55-gallons. According to the facility representative, Room M-2116 serves as a satellite accumulation area (SAA). The containers contained organic bench waste obtained from the dilution of test articles with solvents. Each of the containers were marked as organic waste with waste code D001. The organic bench waste is later transferred and accumulated to a 55-gallon container that is located in another building over 300 feet away in the Hazardous Waste Building. See Photograph #4 and #5.

The inspector observed a tray located on the floor of the Analytical Area holding 5-gallon containers marked as "mixed organics" with hazardous waste code D001. The facility representative stated that the area on the floor serves as a SAA. According to the facility representative, once the 5-gallon containers are full, the hazardous waste is transferred to a 55-gallon drum serving as a SAA in another building over 300 feet away in the Hazardous Waste Building. See Photograph #6.

In the Instrument Area near room M-2117, the inspector observed a 55-gallon drum accumulating TOMTEC test article trays hazardous waste in the SAA. The 55-gallon drum was

observed marked as hazardous waste with waste codes D001 and F003 with the DOT shipping information and UN number. See Photograph #7, #8 and #9.

In the Bio-Analytical Area, the inspector observed a 55-gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Laboratory Waste. See Photograph #10, #11 and #12.

In Room M-2514 of the Test Material Control Area (TMC), ethanol is used to rinse glassware. Once the ethanol is used, it is accumulated in a 5-gallon container. A 5-gallon container was observed marked as hazardous waste with D001 waste code. According to the facility representative, once the 5-gallon container is full, the 5 gallon container is transferred to the SAA of the Hazardous Waste Building. See Photograph #13 and #14.

In Room M-2467 of the TMC, a 55-gallon drum was observed marked as non-hazardous waste with contents listed as TOMTEC Tips Trays. See Photograph #15 and #16.

Also in Room M-2467 of the TMC, a 55-gallon drum was observed marked as universal waste with contents described as pharmaceutical liquid. The container was observed opened and not marked to indicate the length of time the pharmaceutical liquid was stored. At the time of the inspection, no inventory system was declared to identify or demonstrate the earliest date the items became a universal waste. See Photograph #17 and #18. Photo does not include the accumulation date.

In a different area of M-2467 of the TMC, two 55-gallon drums were observed marked as universal waste with contents described as pharmaceutical solid. The containers were not marked to indicate the length of time the pharmaceutical liquid stored. At the time of the inspection, no inventory system was declared to identify or demonstrate the earliest date the items became a universal waste. See Photograph #19 and #20.

In Room M-2514, waste acetone is generated from glass washing operations. During the inspection, two 5-gallon containers storing acetone were observed not marked as hazardous waste and without hazardous waste codes. See Photograph #21. The two 5-gallon containers were marked and properly labeled at the time of the inspection. See Photograph #22.

In the Plastics Room F31, special stains are mixed. Excess stains are stored in 5-gallon containers. Four 5-gallon containers were observed not kept in good condition, but marked as hazardous waste and labeled with D001 hazardous waste codes. See Photograph #23 and #24.

The tour continued to the Drum Room. The Drum Room is located near three major laboratories and serves a SAA, 90-Day Accumulation Storage Area, and a Chemical Product Storage Area. See Photograph #25 and #26.

In the SAA of the Drum Room, a 55-gallon drum was observed marked as hazardous waste with hazardous waste codes D001 and F003. The DOT shipping information and UN number provided on the hazardous waste label. See Photograph #27, #28, #29, #30, and #31.

Also, in the Drum Room, a 55-gallon drum was observed marked as non-hazardous waste containing formalin rags. See Photograph #32 and #33.

A 55-gallon drum located in the 90 Day Accumulation Area of the Drum Room was observed marked as "hazardous waste flammable solids." The drum appeared to be full. No accumulation start date was provided on the drum. Hazardous waste codes were not observed marked on the hazardous waste label. See Photograph #34.

Another 55-gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid, but not as a hazardous waste with waste codes. See Photograph #35 and #36. The 55-gallon drum served as a SAA for one of the nearby Laboratories. A hazardous waste label marked with hazardous waste codes D001 and F003 was placed on the drum at the time of the inspection. The DOT shipping information and UN was also provided at the time of the inspection. See Photograph #37 and #38.

Also in the Drum Room, two 55-gallon drums were observed not marked as a hazardous waste or with hazardous waste codes. According to the facility representative, the two drums were being stored in the 90 Day Accumulation Area. One drum was only marked as a corrosive and the second drum was marked as a hydrochloric acid corrosive waste. See Photograph #39, #40, #41 and #42. Hazardous waste labels were applied to the two drums at the time of the inspection. The accumulation state date was written as 5/15/13 on both of the containers. See Photograph #43 and #44.

The tour moved to the Hazardous Waste Storage Building. See Photograph #45. This building serves as a 90 Day Accumulation Storage Area and SAA. Several 55-gallon drums were observed marked as hazardous waste with accumulation start dates less than 90 days and hazardous waste codes of D001 and F003. See Photograph #46 and #47.

In the SAA of the Hazardous Waste Storage Area, aerosol cans are punctured to remove product residue from maintenance products. The contents of the aerosol cans are accumulated in a 55-gallon drum that is marked as hazardous waste and with hazardous waste codes of D001 and D003. The DOT shipping and UN information is listed as a waste flammable liquid (acetone, xylene, methanol). See Photograph #48.

Also located in the 90 Day Hazardous Waste Storage Building, two plastic 55-gallon drums were observed. One drum was marked as a hazardous waste with an accumulation start date of 5/3/2013. The DOT shipping information was listed as potassium hydroxide. The second drum was observed marked only as a corrosive. No hazardous waste label with an accumulation start date was provided. See Photograph #49. A hazardous waste label was placed on the drum at the

time of the inspection with accumulation start date of 5/15/2013. The DOT shipping information was listed as waste hydrochloric acid was also provided at the time of the inspection. See Photograph #50.

Also in the Hazardous Waste Storage Area, used lamps were observed not labeled as universal waste lamps. See Photograph #51. A universal waste label was provided at the time of the inspection with the accumulation start date of 5/15/13. See Photograph #52.

During the inspection, the Inspector observed fire extinguishers, spill control equipment, internal communications systems, and alarm systems. See photographs #53 and #54. A list of emergency equipment at the facility including location, physical description and capabilities were not provided in the Pollution Incident Prevention Plan dated June 2013.

Record Review

A records review was conducted following the facility tour. The inspector requested to review hazardous waste determination documents, hazardous waste manifest, land disposal restriction (LDR) forms, universal waste documents, personnel training documents, weekly inspection logs, and personnel training records for the past three years. The Inspector reviewed hazardous waste profiles, hazardous waste manifest, land disposal restriction records, and universal waste shipping records during the inspection. Training records and contingencies plan were forwarded to the inspector following the inspection.

At the time of the inspection the generator status was determined to be a large quantity generator based on the amount of hazardous waste generated within one month.

Waste Determination Documents

Two incomplete hazardous waste determinations that were provided on-site at the time of the review. The following discrepancies were noted for the two hazardous waste determinations:

Generator Profile	Date of Notification	Waste Generating Process	Constituents and Waste Code	Observation
Spent Laboratory Waste	05/15/2013	Laboratory Waste	Xylene, alcohol D001 and F003	Generator Waste Profile Form Determination basis not marked as generator knowledge or analytical testing or both
Batteries (Universal Waste) Bulk	02/16/2012	Spent Batteries	Batteries Universal Waste	Determination basis not marked as generator knowledge or

Waste determinations were not provided on-site for the following waste:

TOMTEC Tips; debris formalin rags; laboratory waste containing formaldehyde; laboratory waste containing hydrochloric acid; laboratory waste containing alcohols; and potassium hydroxide waste.

Hazardous Waste Manifest

No concerns were observed in the review of the hazardous waste manifest.

Land Disposal Restriction Documents

No concerns were observed in the review of land disposal restriction documents.

Biennial Reporting Documents

No concerns were observed with biennial reporting requirements.

Container Weekly Inspections

At the time of the review, weekly inspection documentation was not provided for calendar year 2011, 2012 and 2013.

Personnel Training Documents

Personnel training records did not contain job titles and job descriptions. Based on the training records provided the following facility personnel have not been provided did not take part in annual training:

Larry McKee - calendar Year 2012

Richard Ganberg - calendar Year 2011 and 2013

Contingency Plan and Emergency Procedures

The name, address, and phone number (office and home) of emergency coordinator was not provided in the Emergency Action Plan.

Preparedness and Prevention

Coordination efforts with local emergency response agencies were not documented and provided during the review.

Universal Waste

Universal waste containers not kept closed and labeled with the earliest date the items became a universal waste.

Closing Conference

A closing conference was conducted with Mrs. Lisa B. Sexton, Mr. Richard Granberg, and Mrs. Mary Ann Scott. The Inspector summarized the areas of concern noted during the inspection. Inspector Dabner explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection. The inspection concluded at approximately 4:45 p.m.

Post-Inspection

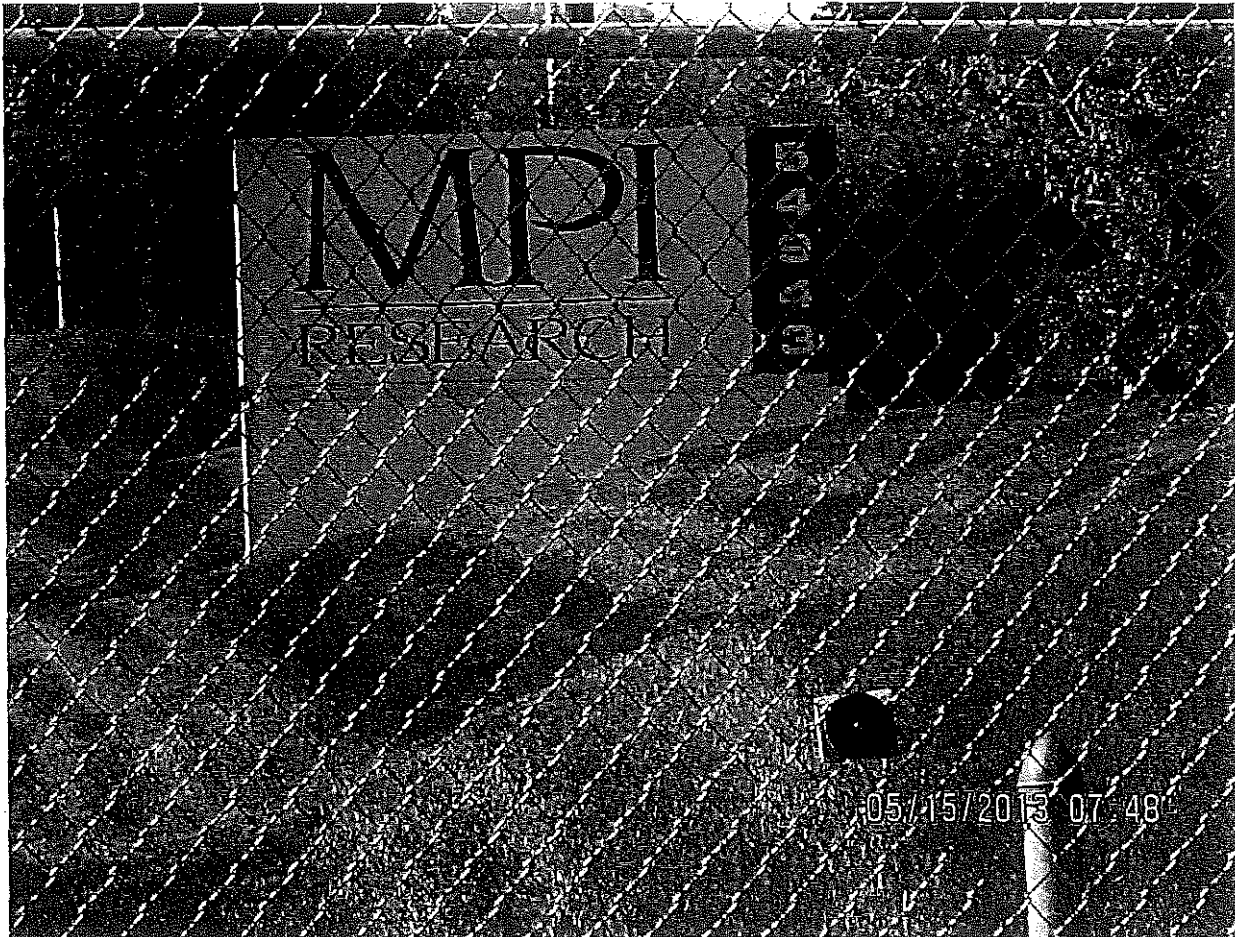
Prior to completion of this inspection report, Lisa Sexton and Mr. Granberg provided Inspector Dabner supplemental information. Supplemental information is provided in Attachment F- MPI Post-Inspection Document Log.

Attachments

- A. MPI Research Inspection Photographs
- B. MPI Research Photograph Log
- C. MDEQ Fully Regulated Generator Inspection Checklist for MPI Research
- D. MDEQ Universal Waste Handler Inspection Report-Small Quantity Handler for MPI Research
- E. MPI Research Supporting Document Log
- F. MPI Research Post-Inspection Document Log

ATTACHMENT A
MPI Inspection Photographs
MID 048 989 891

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #1

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Description: Photograph of the facility sign

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #2

Name of Photographer: Cindy Dabner

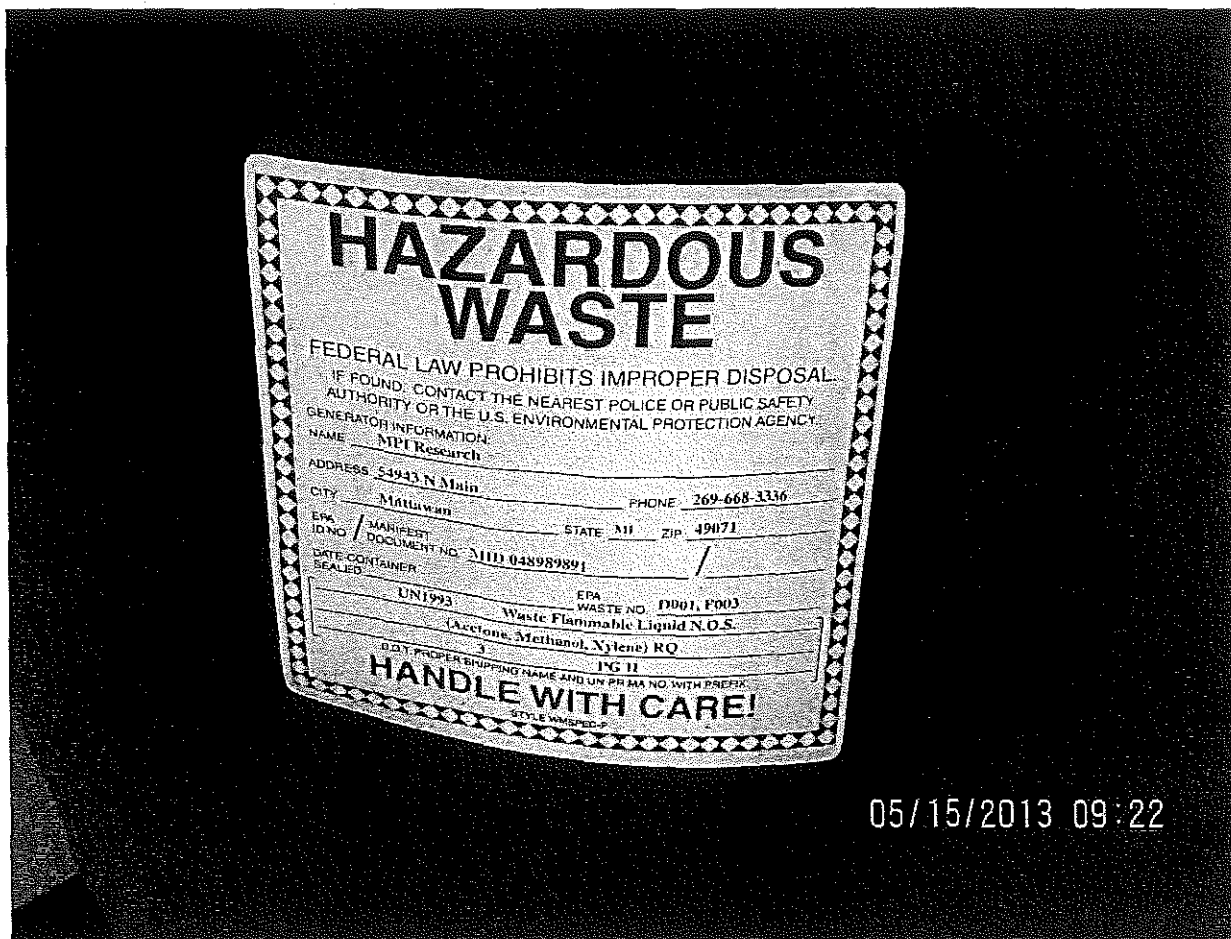
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area

Description: A 55-gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #3

Name of Photographer: Cindy Dabner

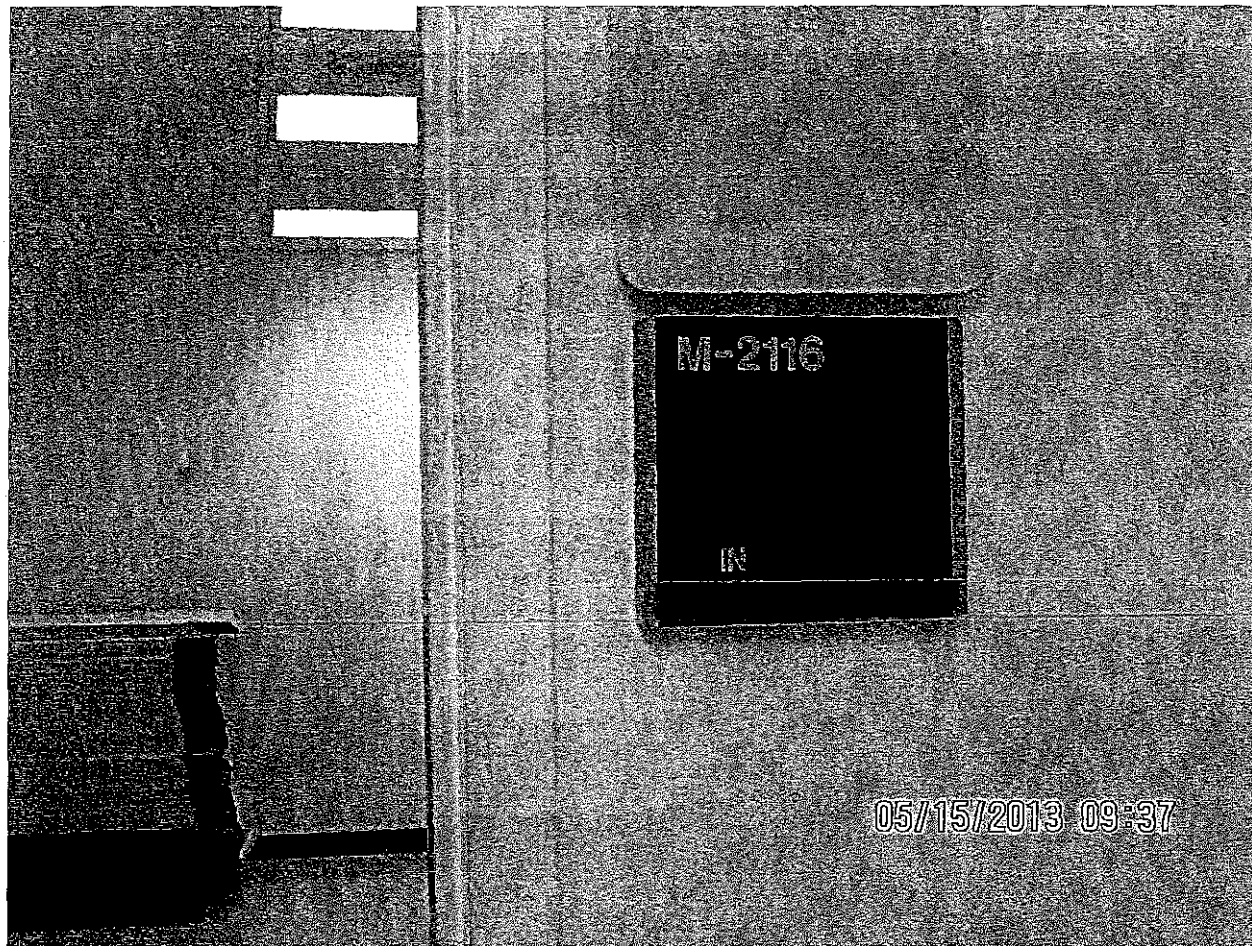
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area

Description: A closer picture of the label of the 55-gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #4

Name of Photographer: Cindy Dabner

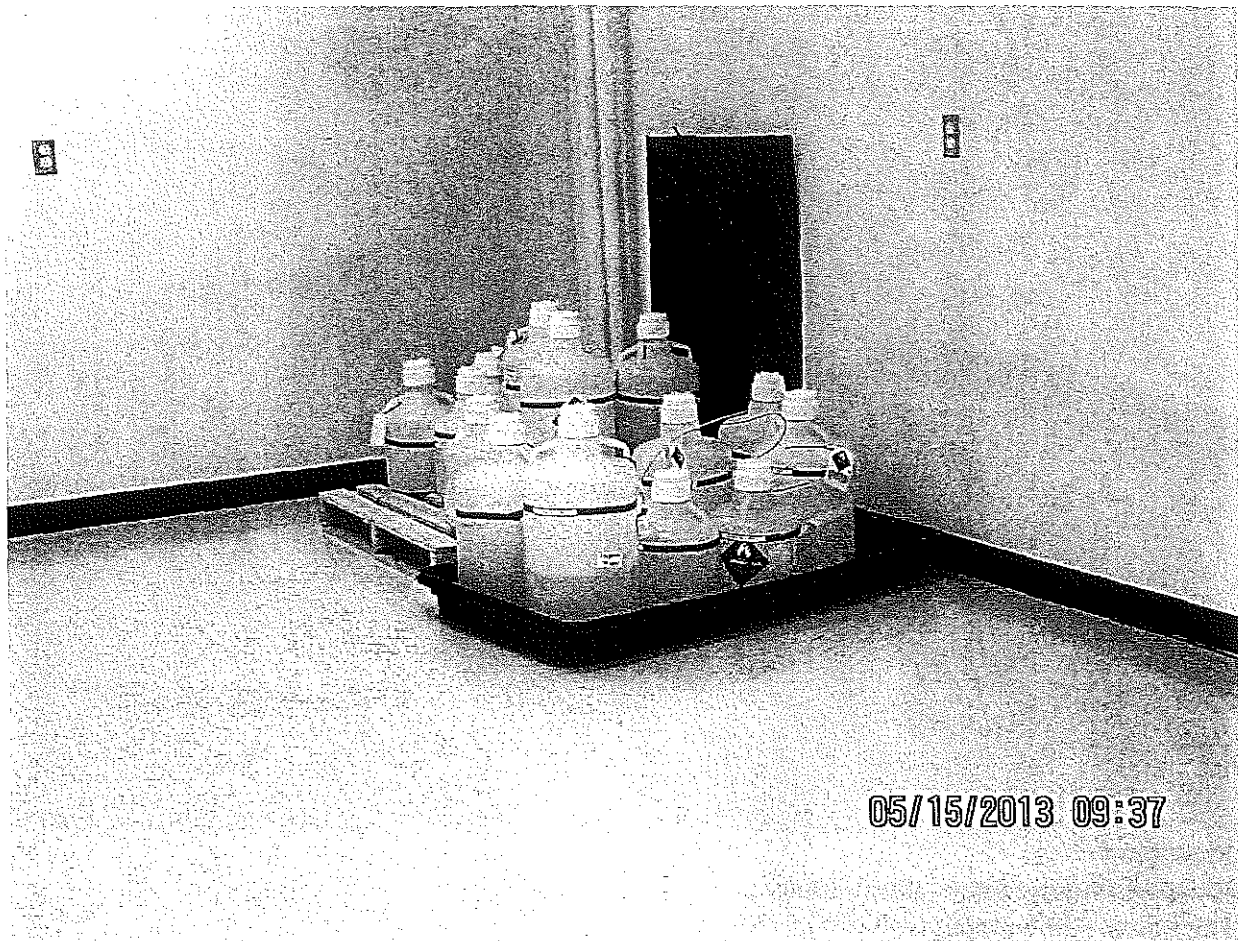
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area Room M-2116

Description: A picture of the room sign where hazardous waste is stored in 5-gallon containers.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #5

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area Room M-2116

Description: A picture of the hazardous waste contained in containers ranging in various sizes in Room M-2116.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #6

Name of Photographer: Cindy Dabner

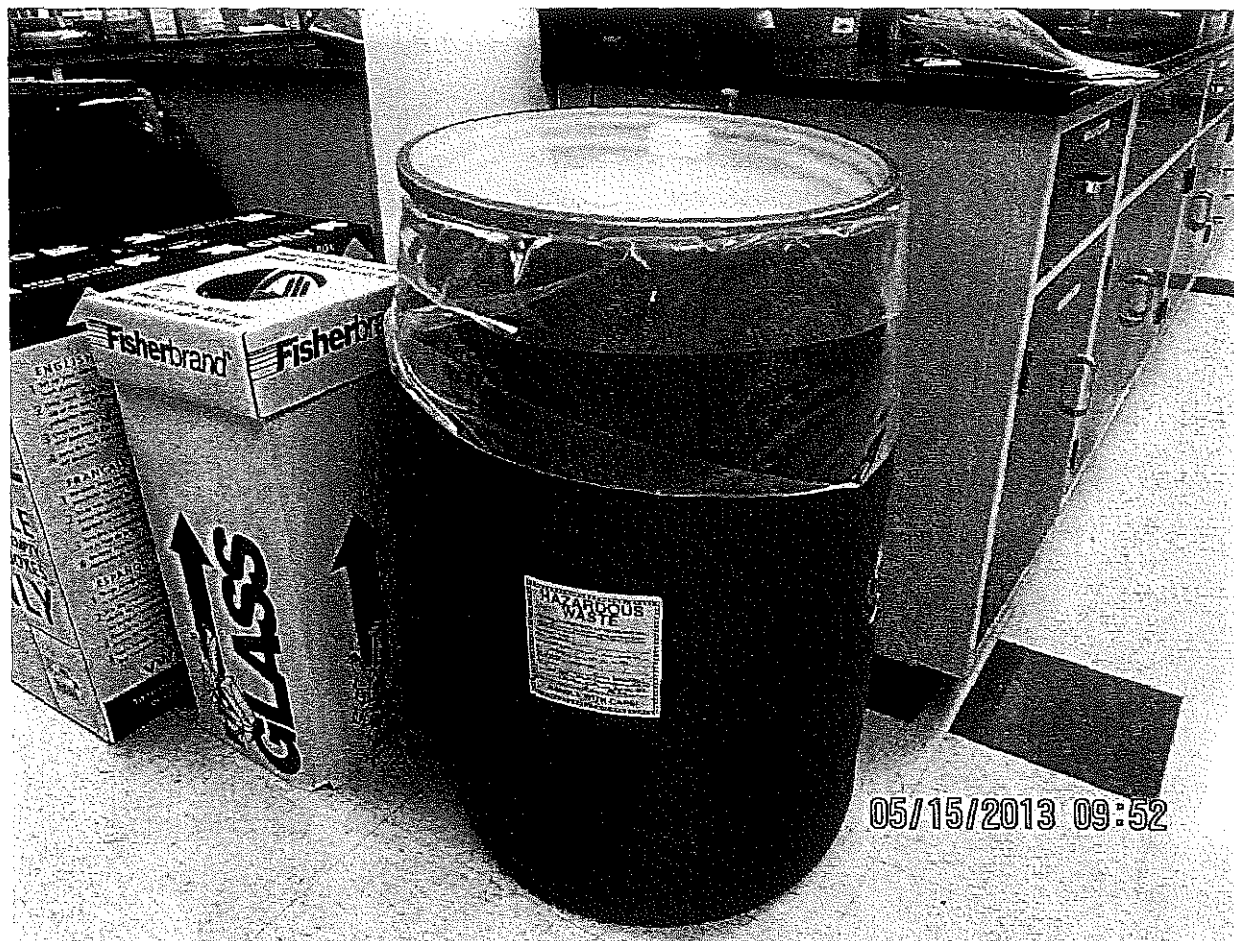
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area

Description: A tray located on the floor of the Analytical Area holding 5-gallon containers labeled as "mixed organic waste."

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #7

Name of Photographer: Cindy Dabner

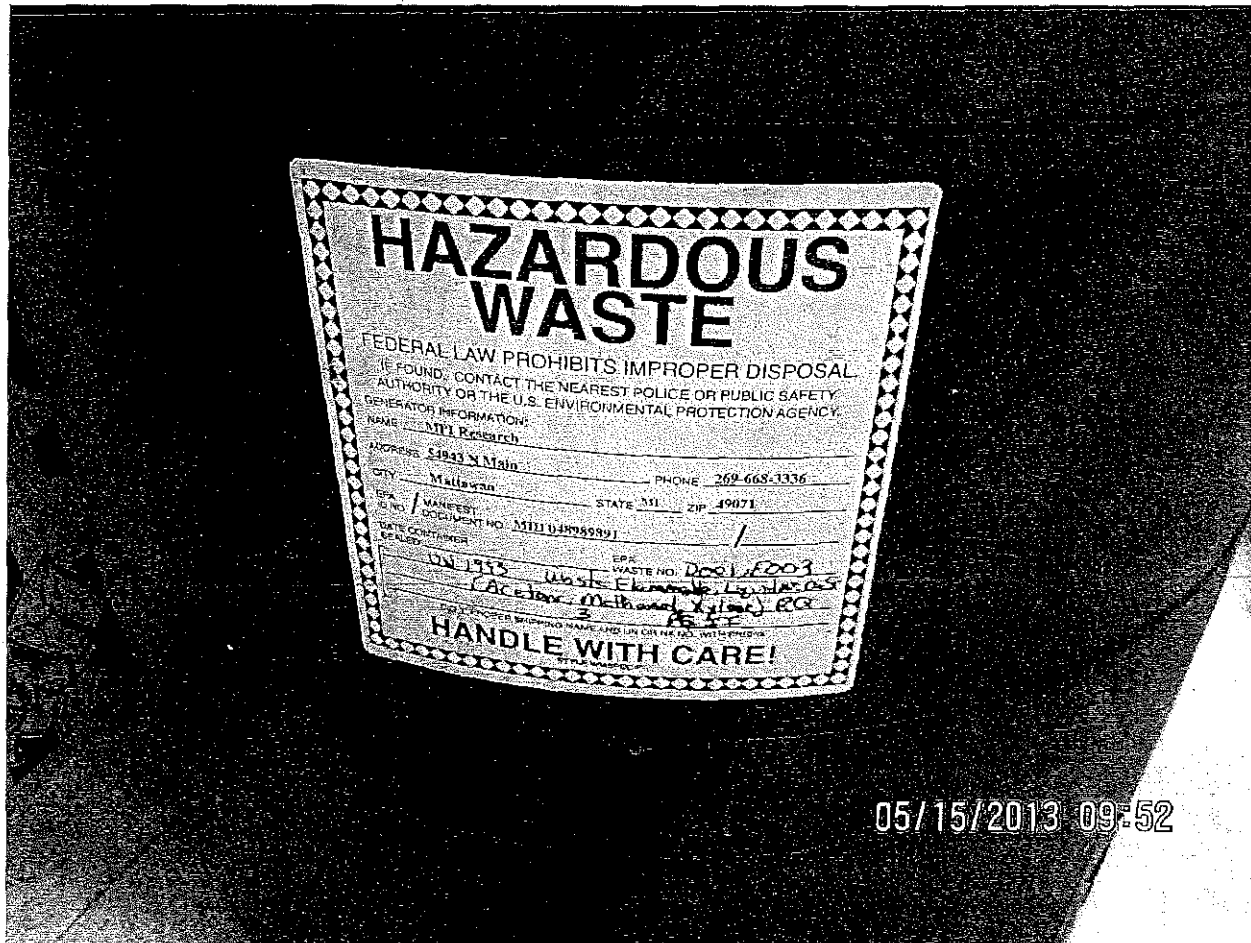
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Instrument Area Room M-2117

Description: A 55-gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #8

Name of Photographer: Cindy Dabner

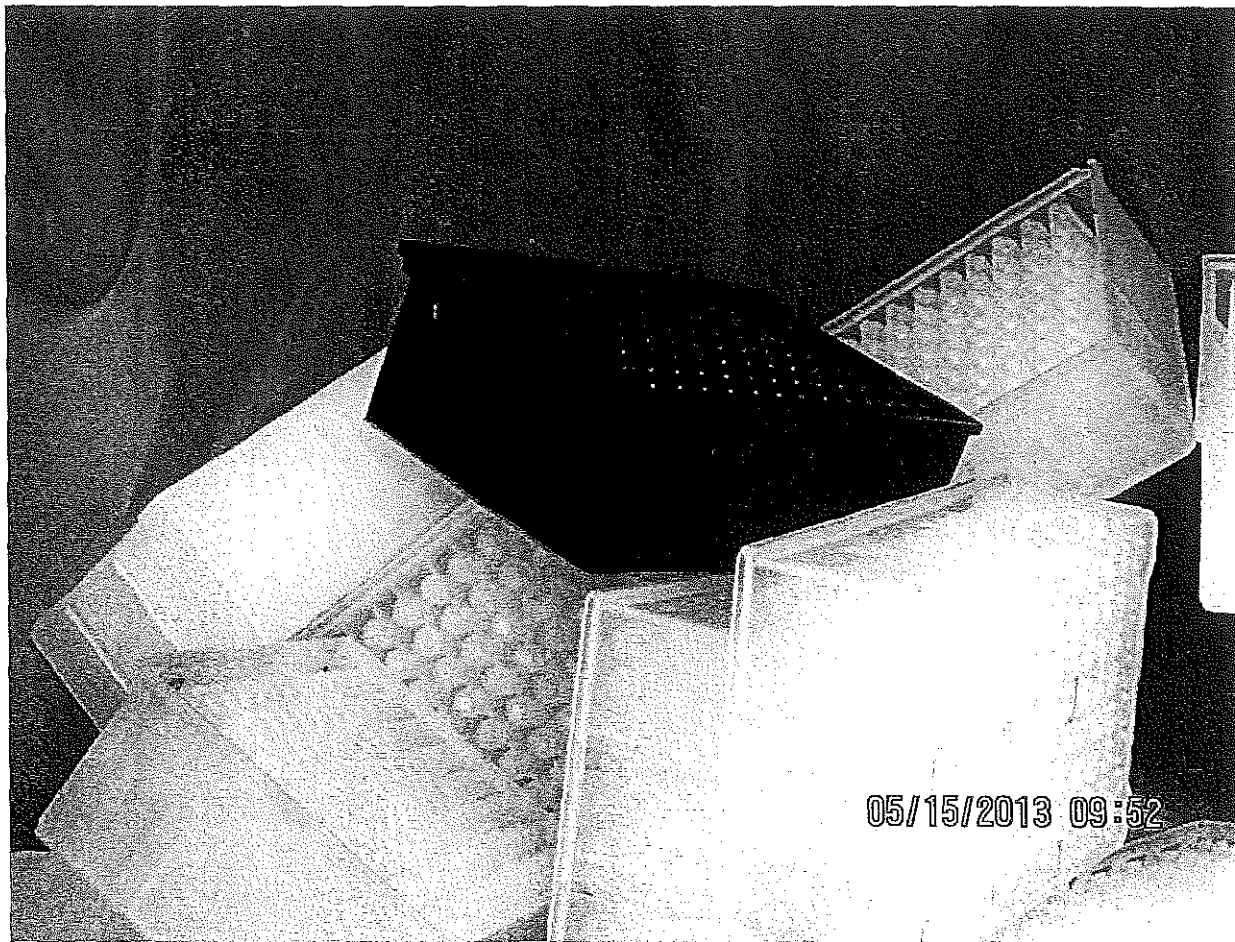
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area Instrument Area Room M-2117

Description: A closer picture of the label on the 55-gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #9

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area Instrument Area Room M-2117

Description: A picture of the TOMTEC test article trays contained in photograph #7 and #8.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #10

Name of Photographer: Cindy Dabner

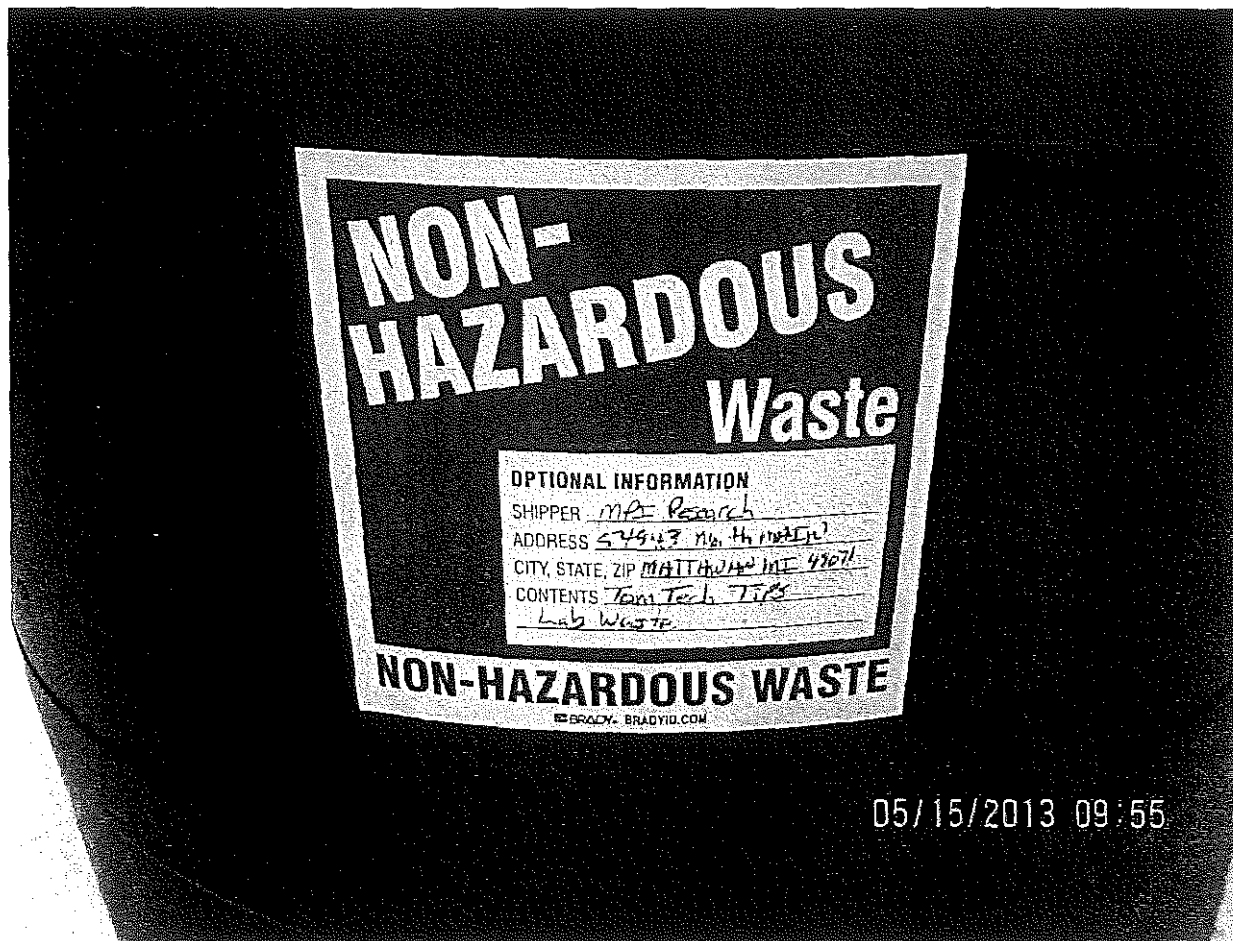
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Bio-Analytical Area

Description: A 55-gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Laboratory Waste.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #11

Name of Photographer: Cindy Dabner

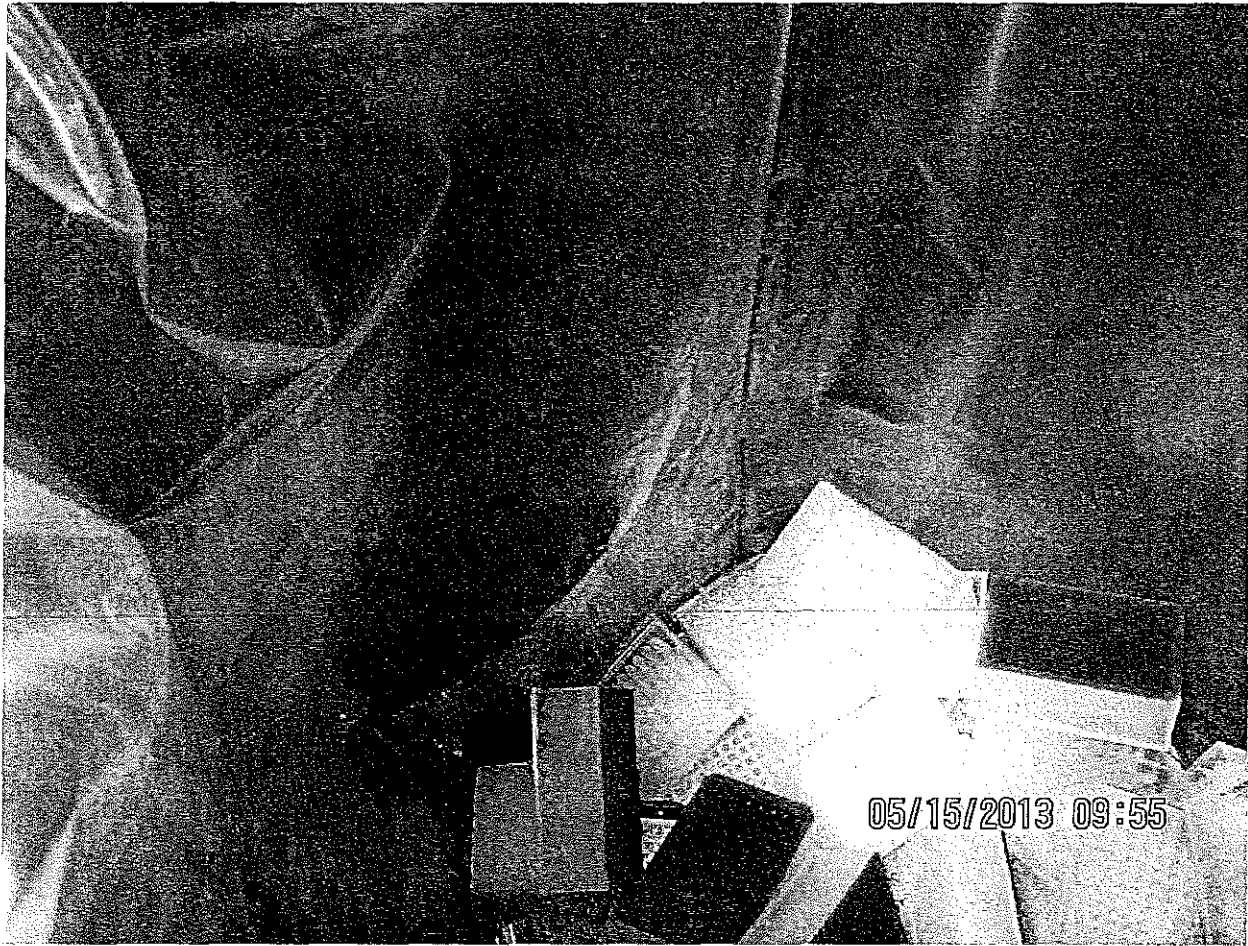
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Bio-Analytical Area

Description: A closer picture of the label of the 55-gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Lab Waste.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #12

Name of Photographer: Cindy Dabner

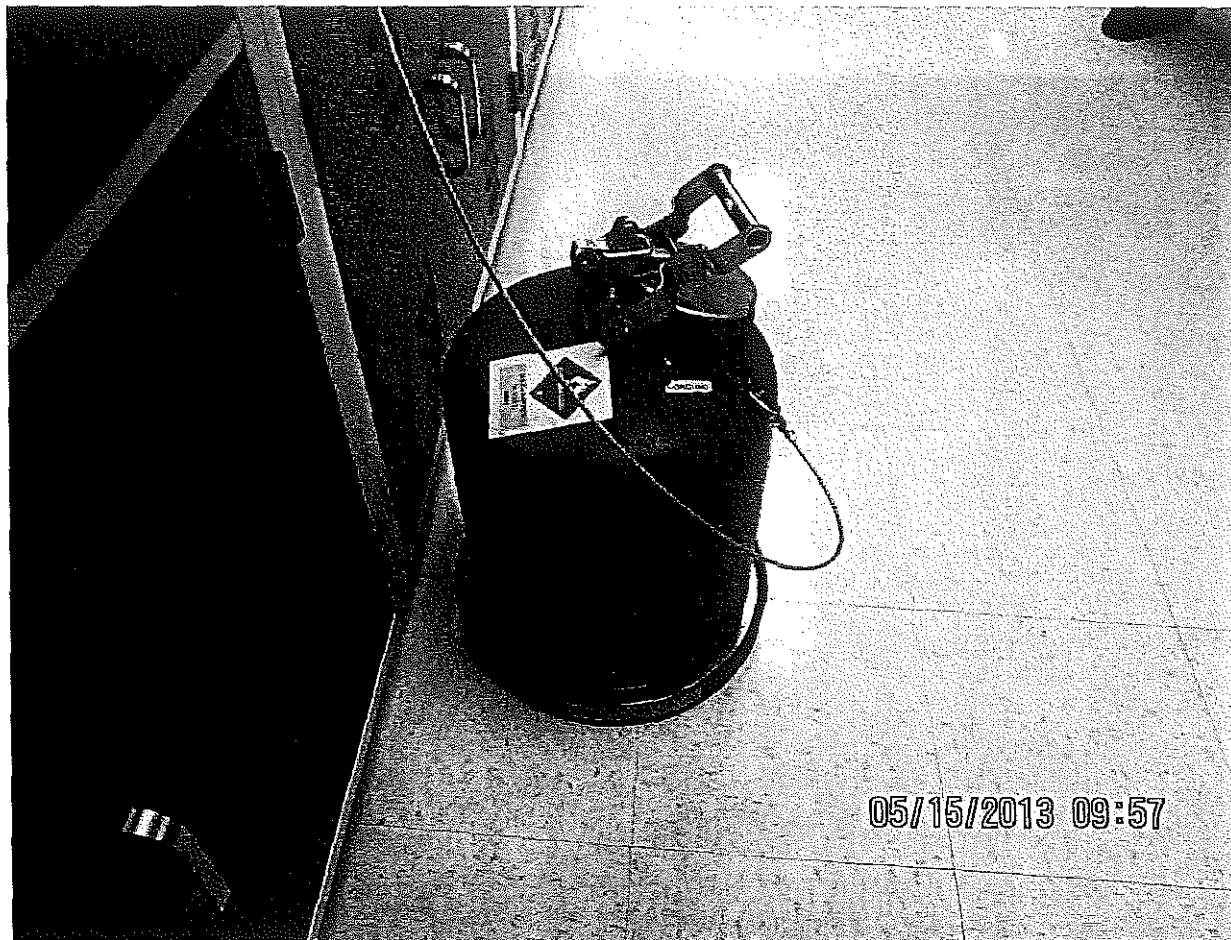
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Bio-Analytical Area

Description: A picture of the contents of 55-gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #13

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2514 of the Test Material Control Area (TMC)

Description: A container was observed marked as hazardous waste with D001.waste code.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #14

Name of Photographer: Cindy Dabner

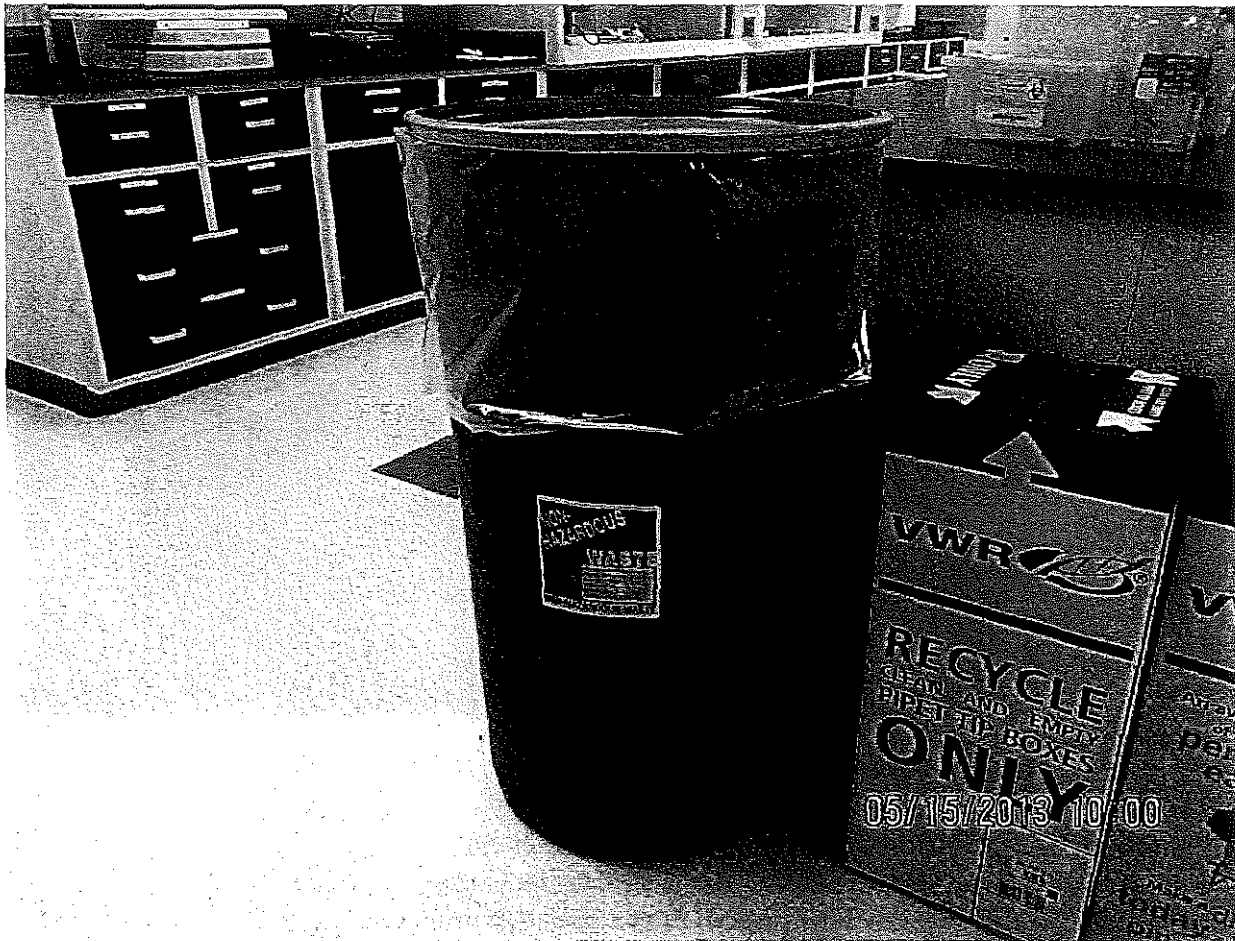
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2514 of the Test Material Control Area (TMC)

Description: A closer picture of the 5 gallon container observed marked as hazardous waste with D001 waste code.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #15

Name of Photographer: Cindy Dabner

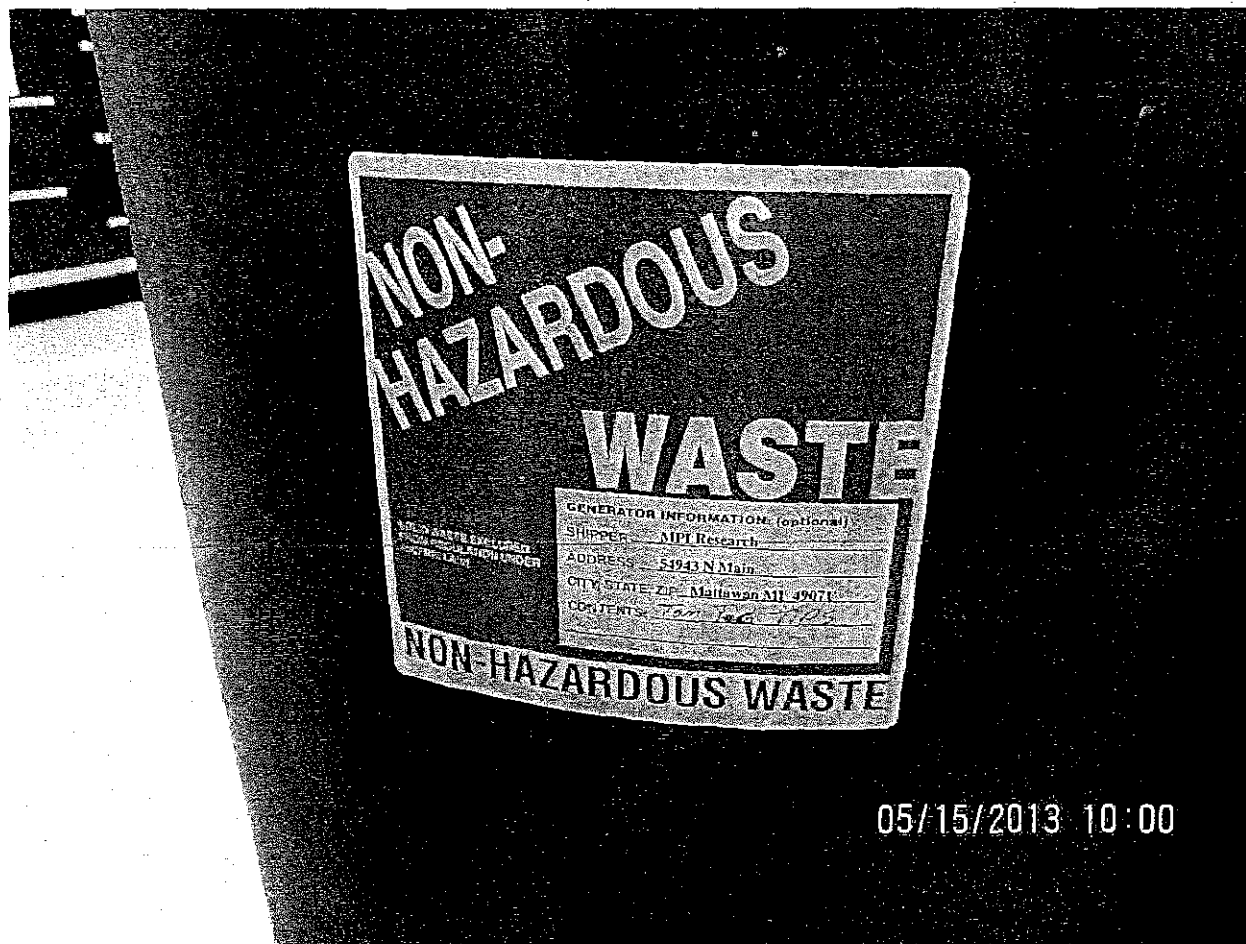
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the Test Material Control (TMC) Area

Description: Non-hazardous waste with contents marked as TOMTEC Tips Trays.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
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Photograph: #16

Name of Photographer: Cindy Dabner

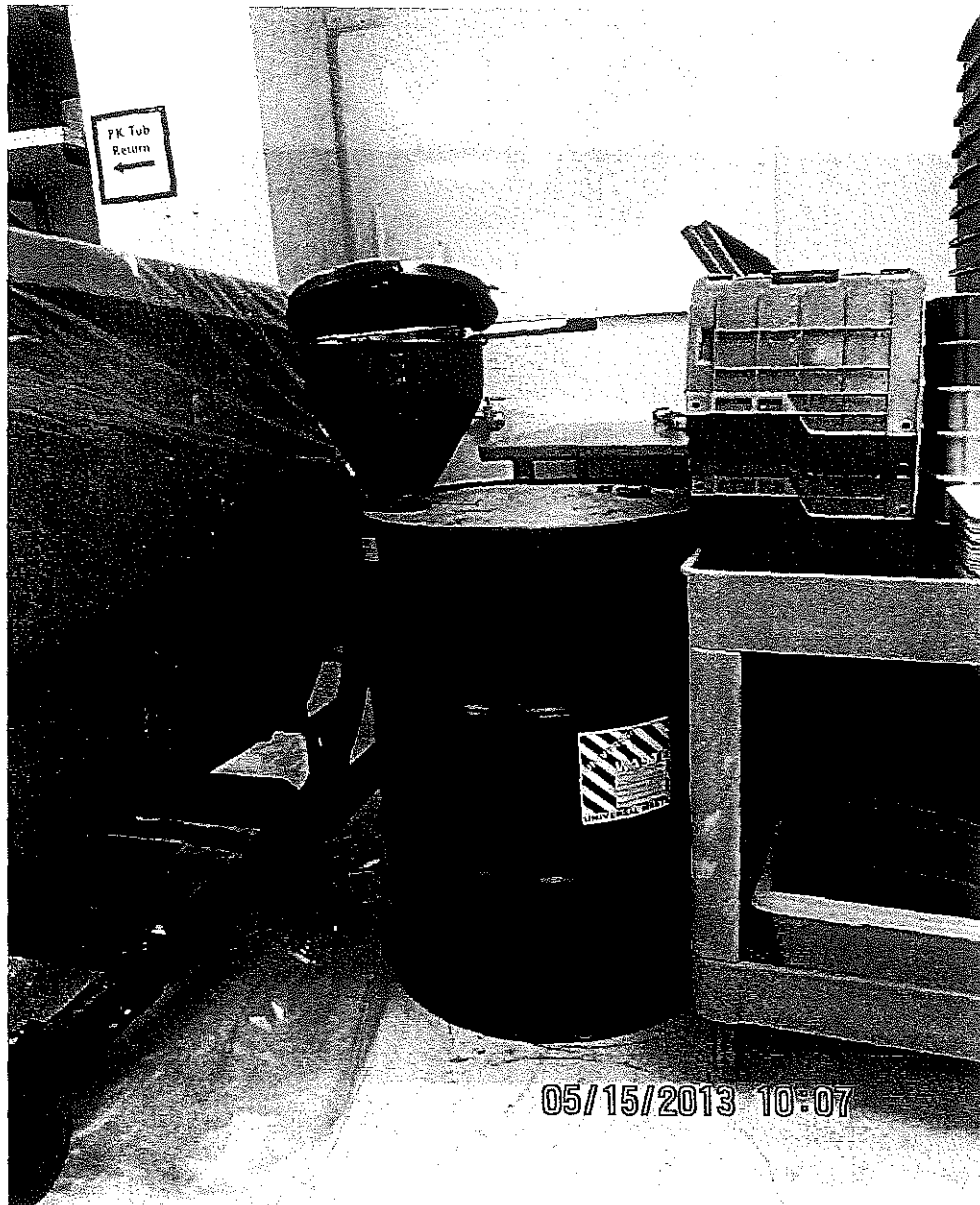
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the Test Material Control Area (TMC)

Description: A closer picture of the label of the 55-gallon drum marked as Non-hazardous waste with contents marked as TOMTEC Tips Trays.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #17

Name of Photographer: Cindy Dabner

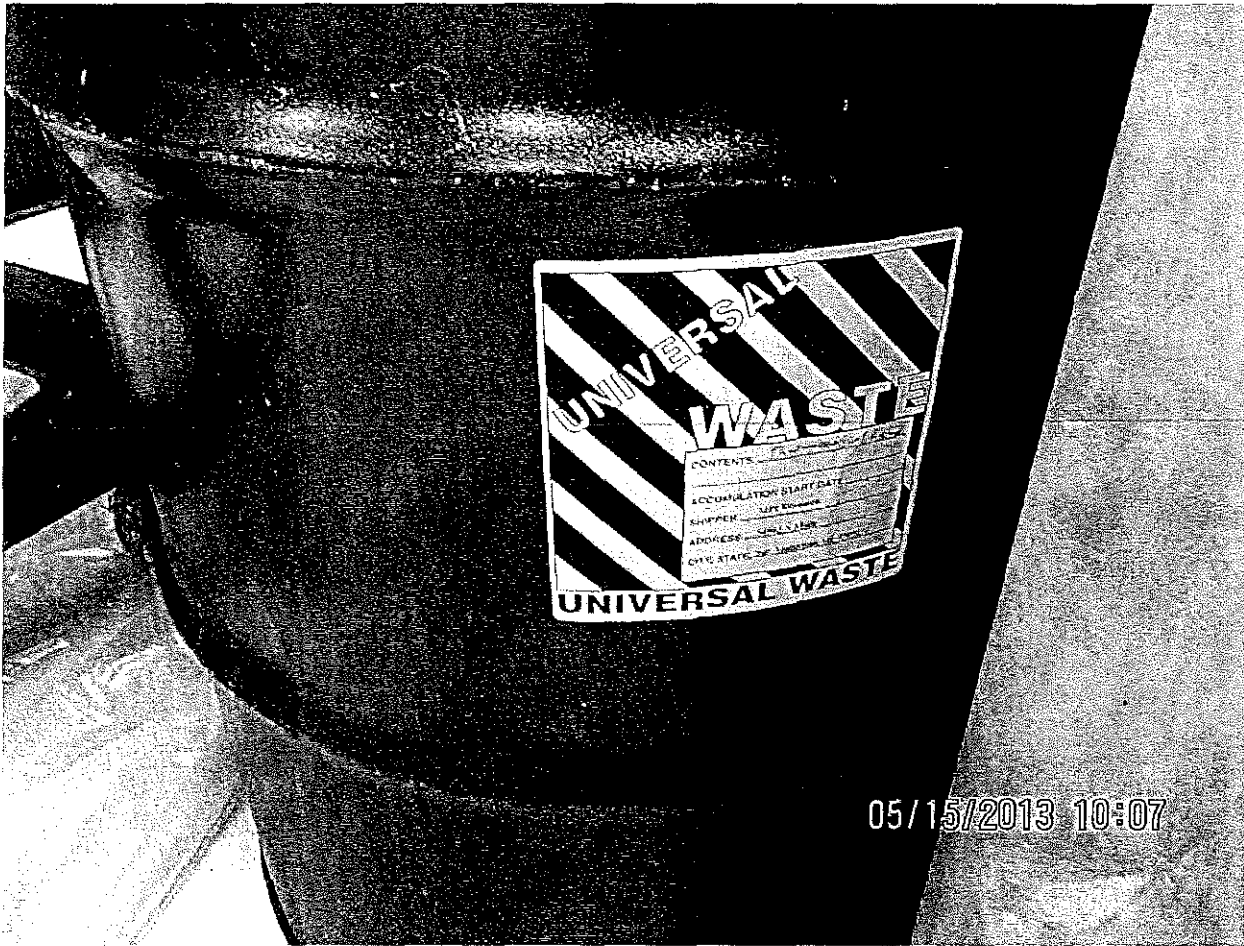
Date/Time of Photograph: May15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the Test Material Control Area (TMC)

Description: Open 55-gallon drum marked as universal pharmaceutical liquid

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #18

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the Test Material Control Area (TMC)

Description: A closer picture of the Open 55-gallon drum marked universal pharmaceutical liquid

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #19

Name of Photographer: Cindy Dabner

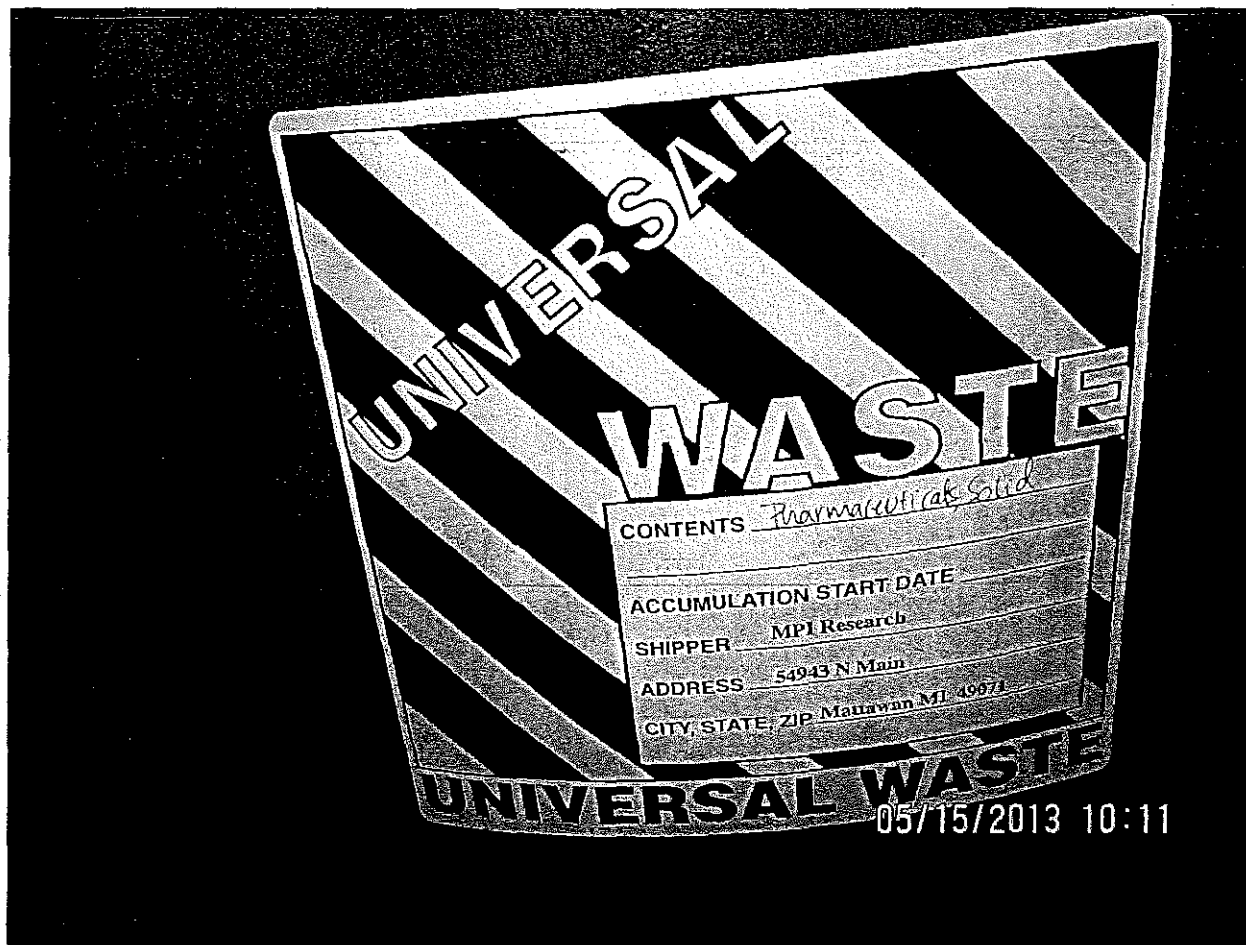
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the TMC

Description: Two 55-gallon drums marked as universal pharmaceutical solids were observed closed and not marked with the accumulation start date.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #20

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the TMC

Description: A closer picture of a 55-gallon drum marked as universal pharmaceutical solid was observed closed without an accumulation start date.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #21

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2514

Description: Two 5-gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #22

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467

Description: Two 5-gallon containers labeled as hazardous waste and marked with hazardous waste codes at the time of the inspection.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #23

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Plastics Room F31

Description: Four 5-gallon containers were observed marked as hazardous waste and labeled with D001 hazardous waste codes, but not kept in good condition.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
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Photograph: #24

Name of Photographer: Cindy Dabner

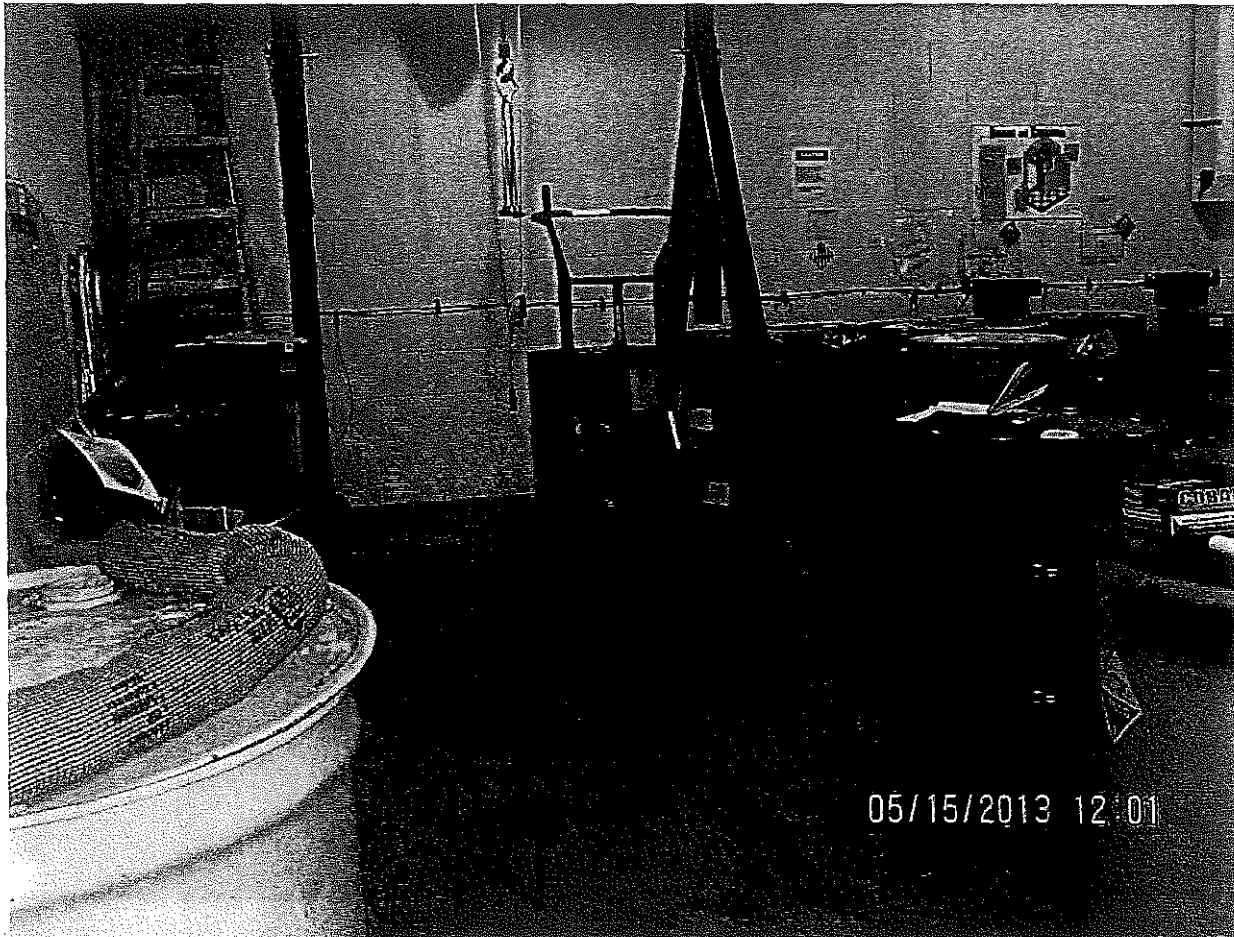
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Plastics Room F31

Description: A closer picture of the 5-gallon container shown in photograph #23

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #25

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: A picture of the Drum Room

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #26

Name of Photographer: Inspector Cindy Dabner

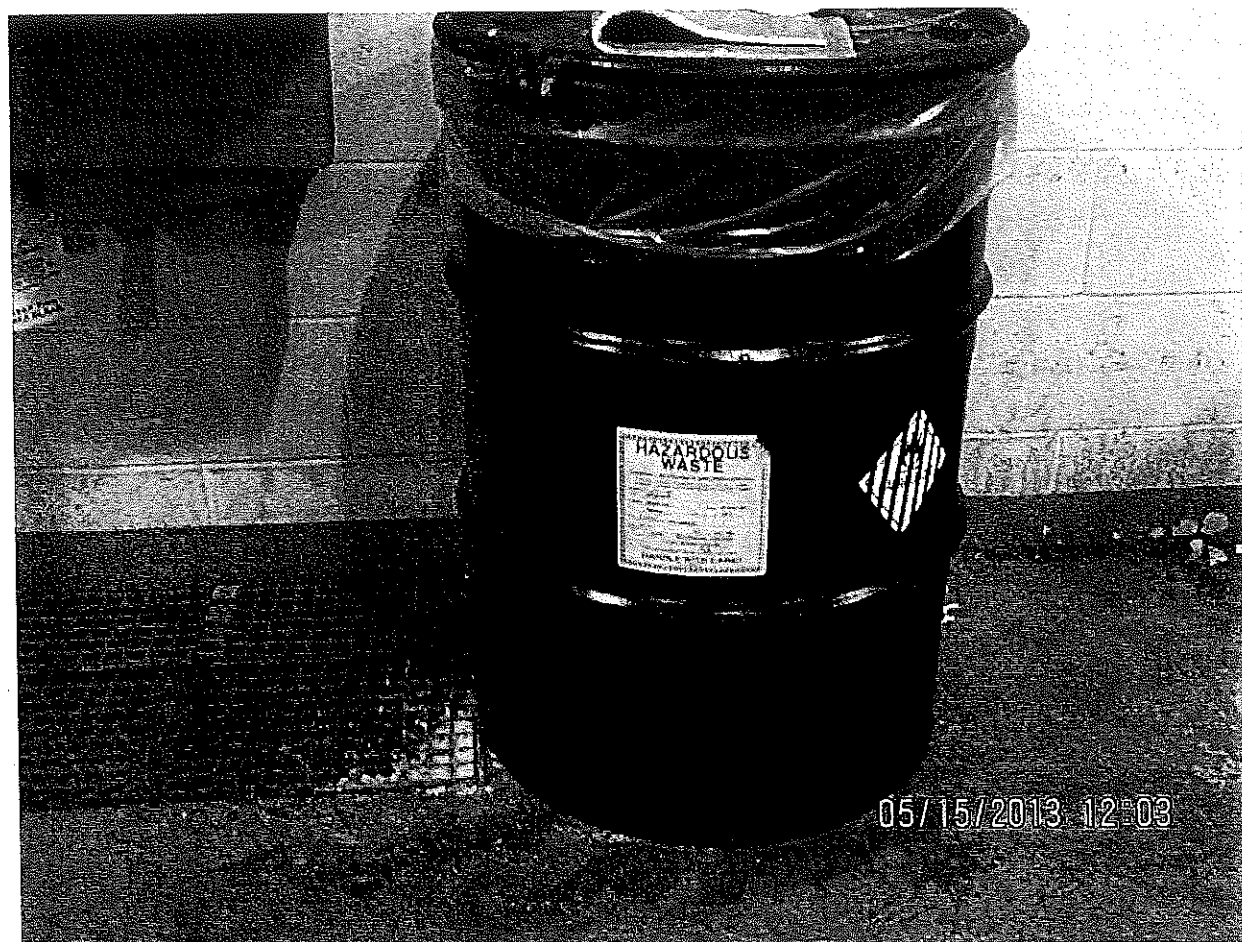
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: Chemical product stored in the Drum Room

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #27

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation Area of the Drum Room

Description: A 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #28

Name of Photographer: Cindy Dabner

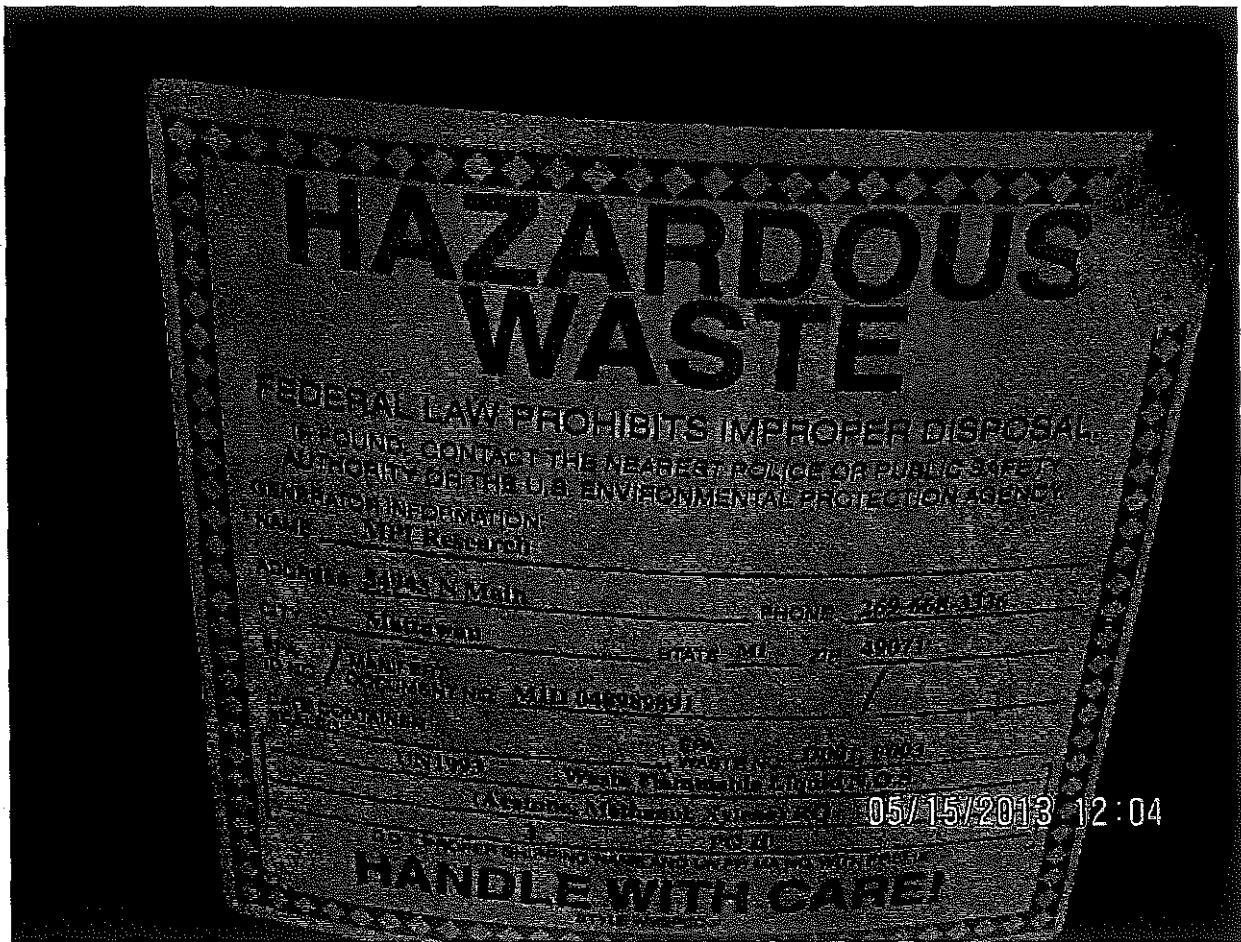
Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation Area of the Drum Room

Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #29

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation Area of the Drum Room

Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #30

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation Area of the Drum Room

Description: A picture of the 55 gallon drum was observed in photographs #27, #28, and #29.

The drum was marked as hazardous waste (acetone, methanol, and xylene) and hazardous waste codes D001 and F003.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #31

Name of Photographer: Cindy Dabner

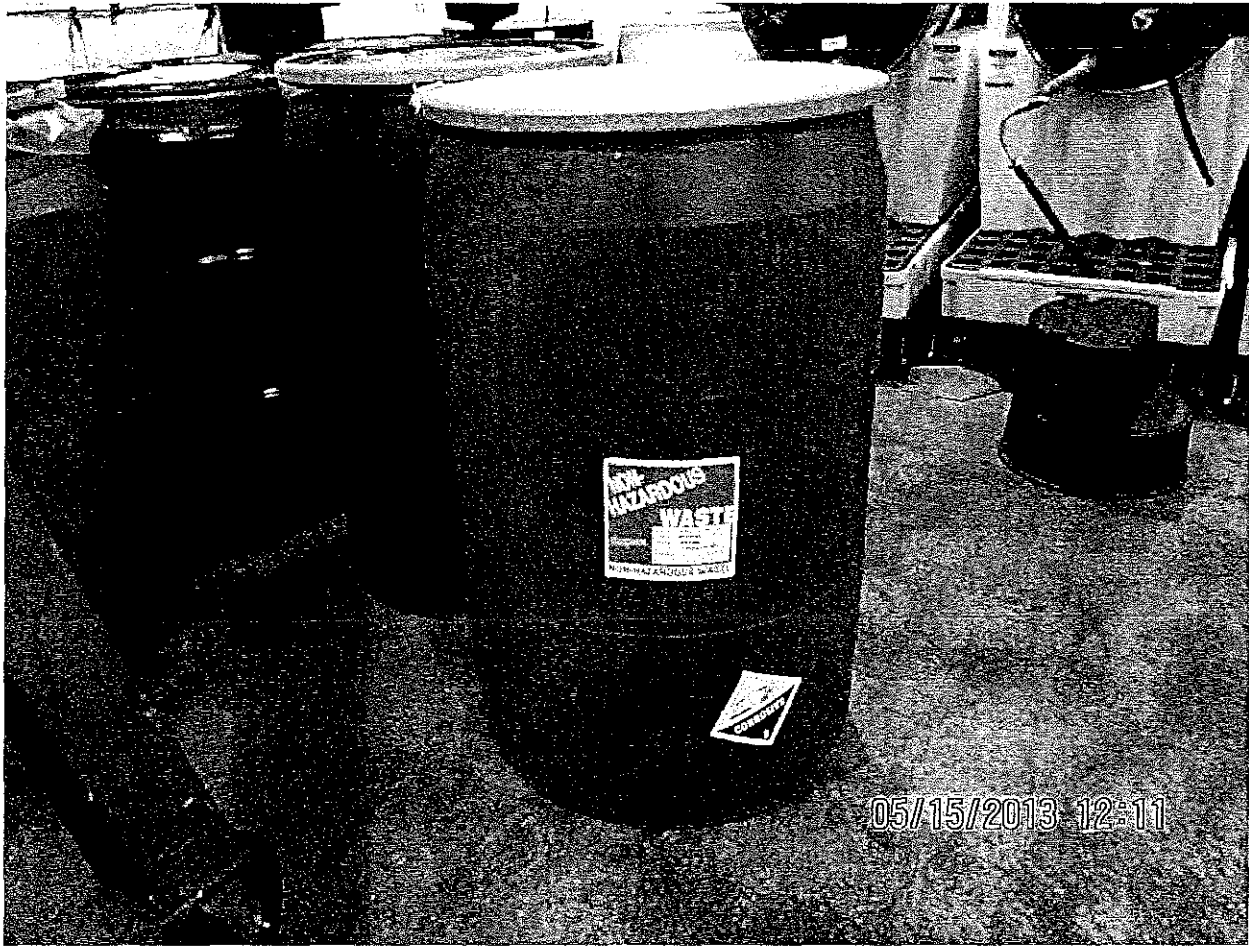
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation of the Drum Room

Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #32

Name of Photographer: Cindy Dabner

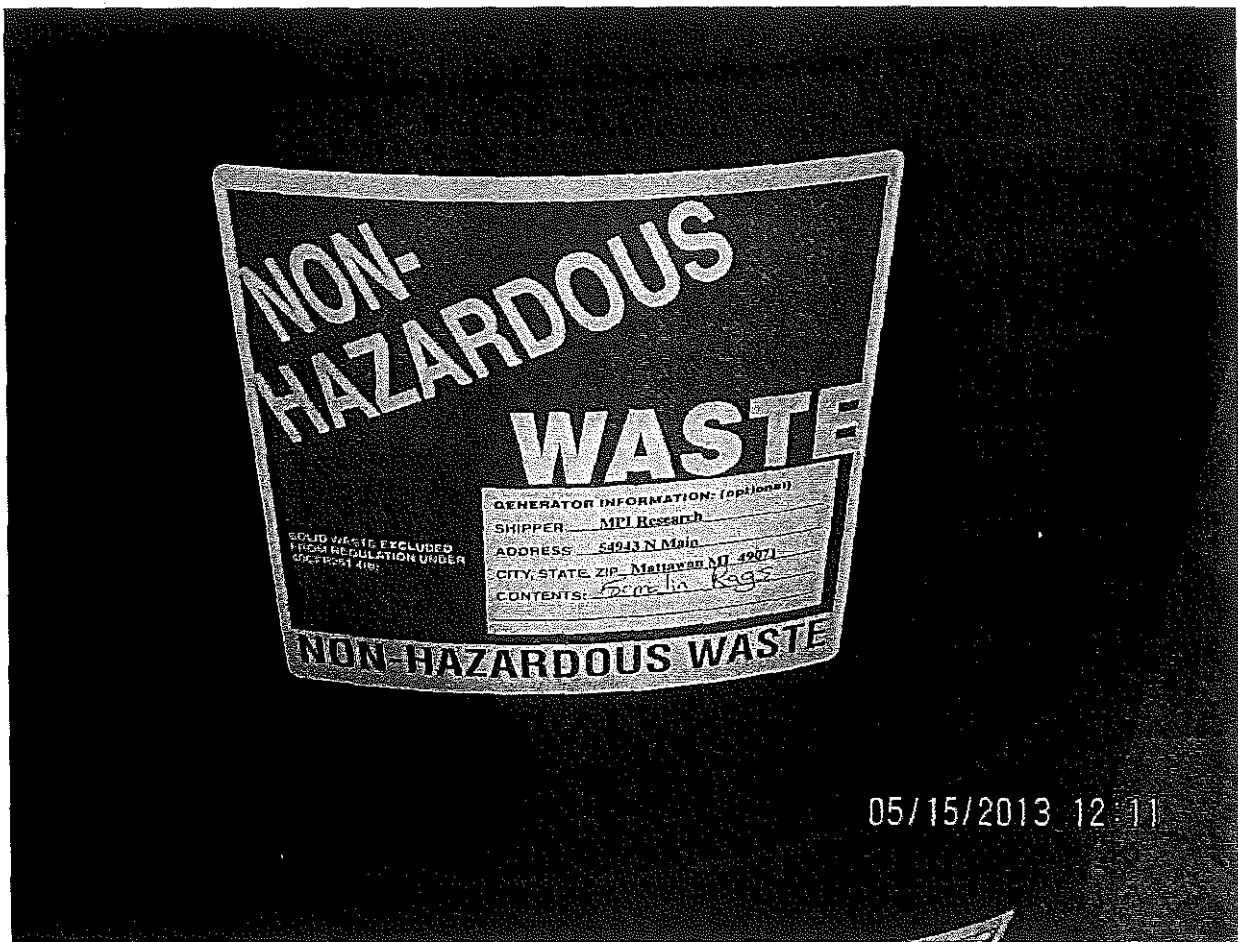
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: A 55 gallon drum was marked as non-hazardous waste containing formalin rags.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #33

Name of Photographer: Cindy Dabner

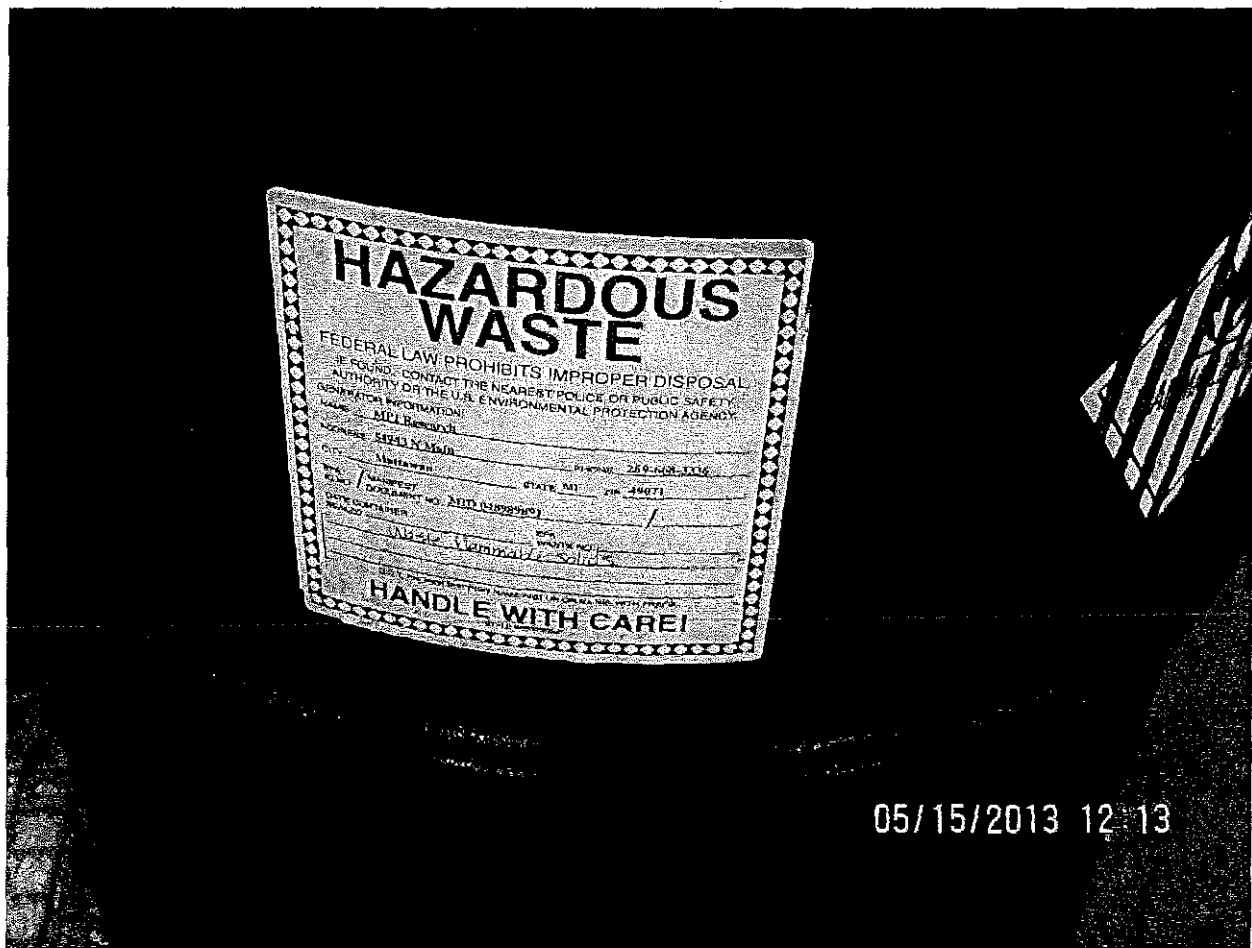
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: A closer picture of the non-hazardous waste label found in photograph #32

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #34

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: A 55 gallon drum marked as hazardous waste flammable solids without accumulation start date.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #35

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Drum Room

Description: Top view of 55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid.

Attachment A
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Photograph: #36

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Drum Room

Description: 55 gallon drum located in the Drum Room was observed labeled as a xylene/paraffin waste and a flammable solid.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #37

Name of Photographer: Cindy Dabner

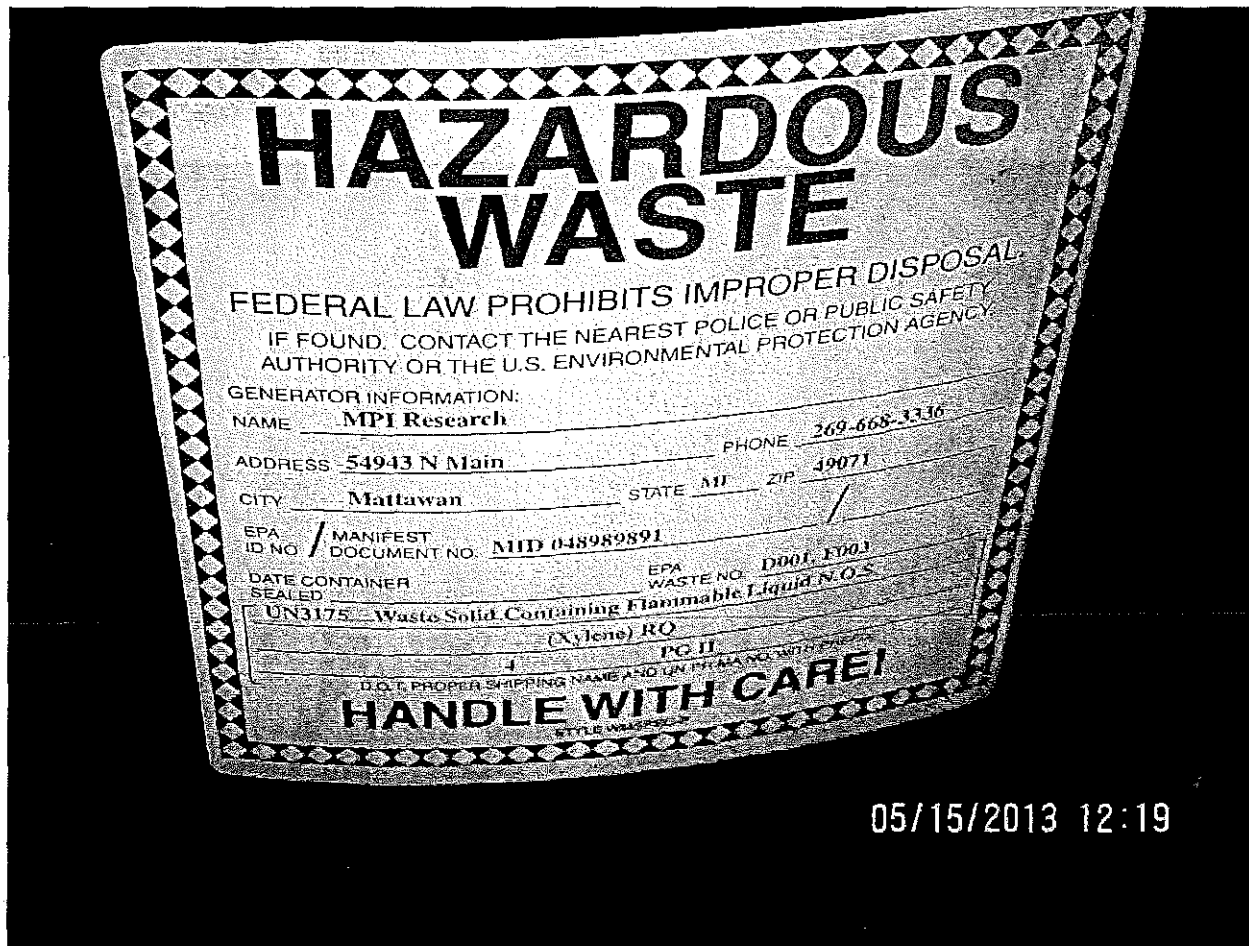
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Drum Room

Description: Hazardous waste label added to the 55 gallon drum in photograph #36 during the inspection.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #38

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Drum Room

Description: A closer picture of the hazardous waste label added to the 55 gallon drum in photograph#37 during the inspection.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #39

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Two 55 gallon drum observed not marked as hazardous waste with the hazardous waste codes.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #40

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #41

Name of Photographer: Cindy Dabner

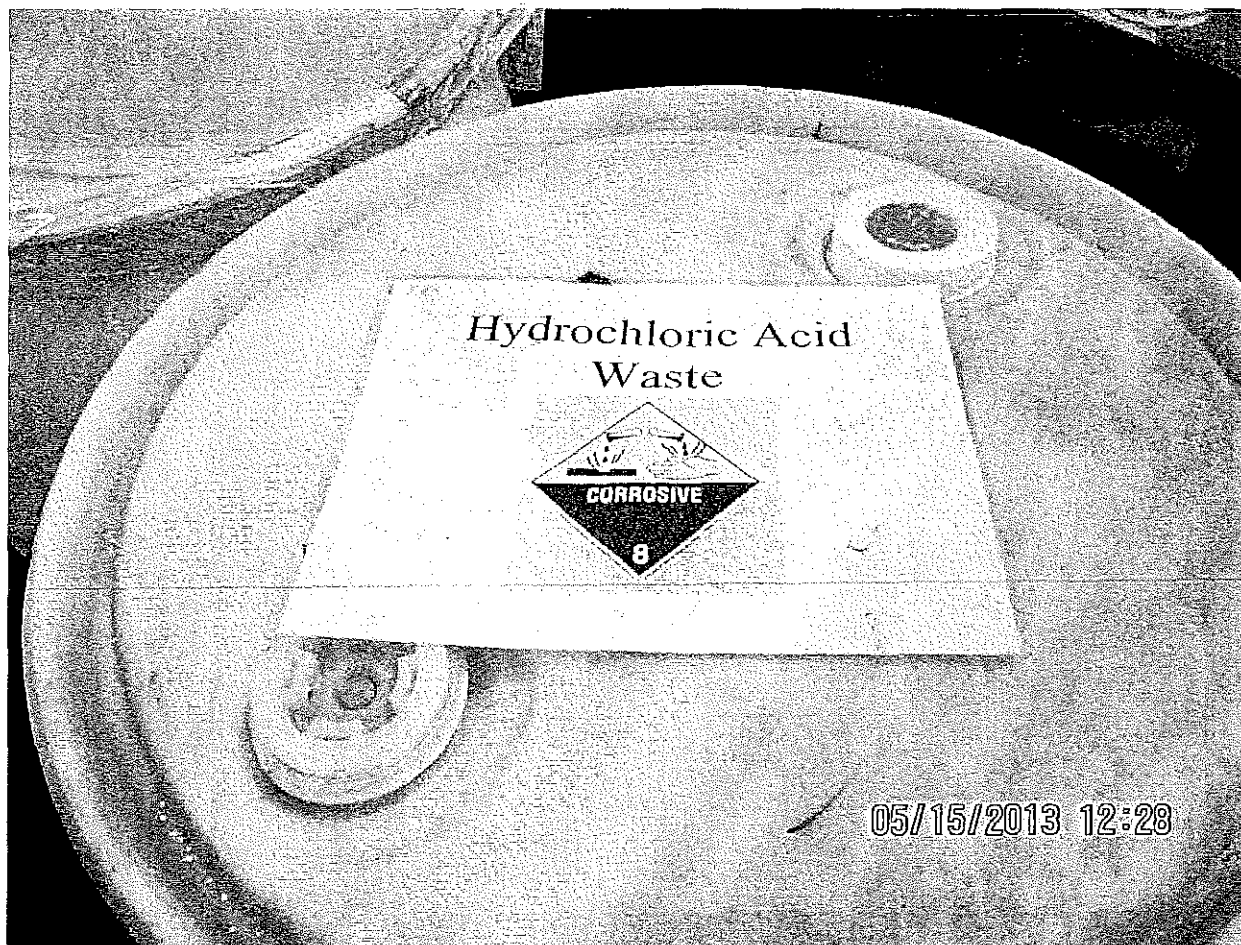
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #42

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Top view of one drum shown in photograph #41

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

UNIVERSITY OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE

NAME
ADDRESS
CITY
STATE
ZIP

HANDLE WITH CARE!

CORROSIVE

05/15/2013 12:34

Description: Drum identified in photo#198 labeled as a waste hydrochloric acid without hazardous waste codes was placed on during the inspection.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME: MPI Research

ADDRESS: 54943 N Main

CITY: Mattawan

STATE: MI

ZIP: 49071

PHONE: 269-668-1136

EPA ID NO. /

MANIFEST DOCUMENT NO. MID 048989891

DATE: 05/15/13

TIME: 12:34

LOCATION: 90 Day Accumulation Area of the Drum Room

HANDLE WITH CARE!

Photograph: #44

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Container marked with accumulation start date

Attachment A
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Photograph: #45

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #46

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #47

Name of Photographer: Cindy Dabner

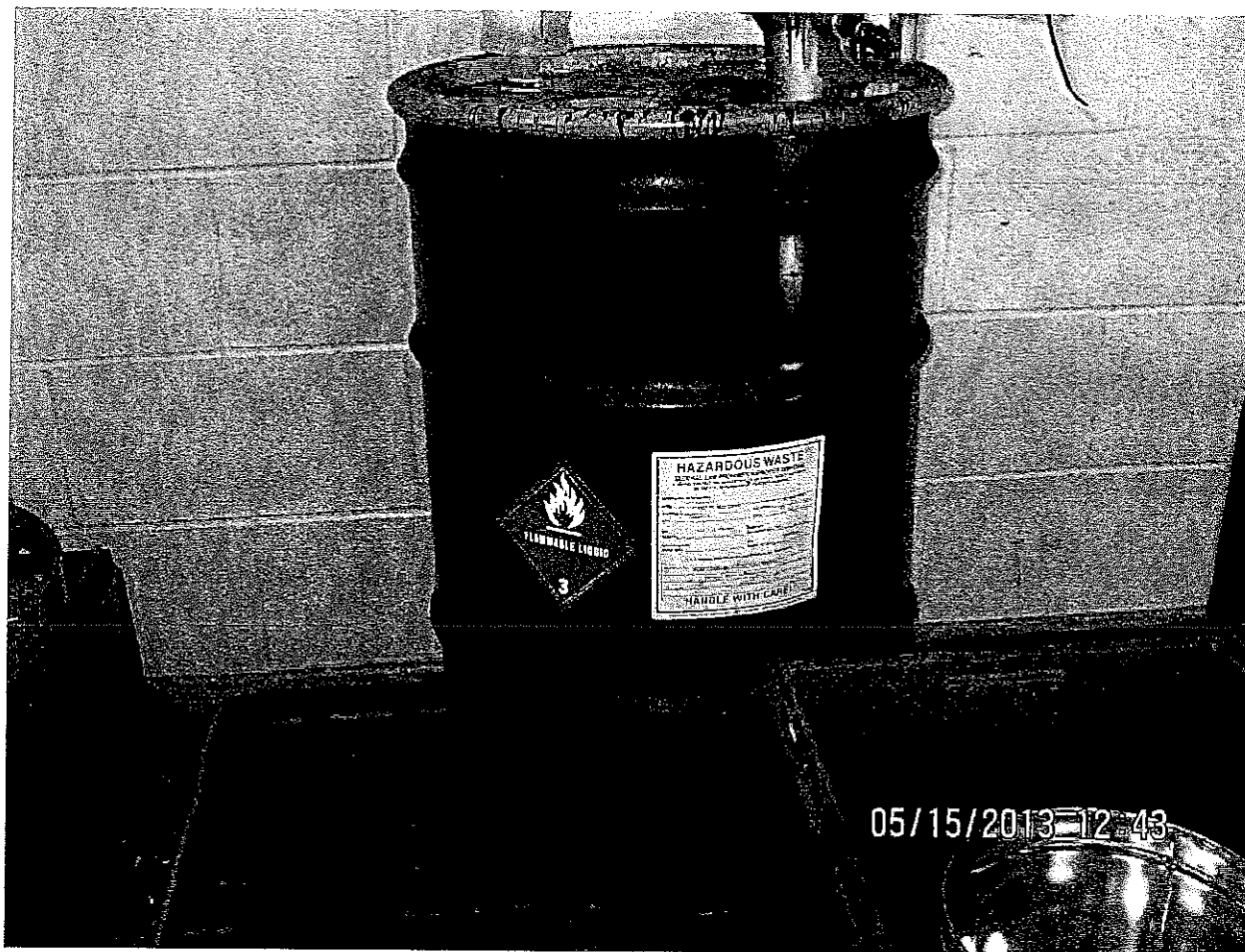
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #48

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Hazardous Waste Building

Description: Container marked and labeled with the item of waste (acetone, xylene, methanol)

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #49

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Container not marked and labeled with contents of waste (hydrochloric acid)

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #50

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Container marked and labeled at the time of the inspection

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #51

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Hazardous Waste Building

Description: Container not marked and labeled as universal waste lamps

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #52

Name of Photographer: Cindy Dabner

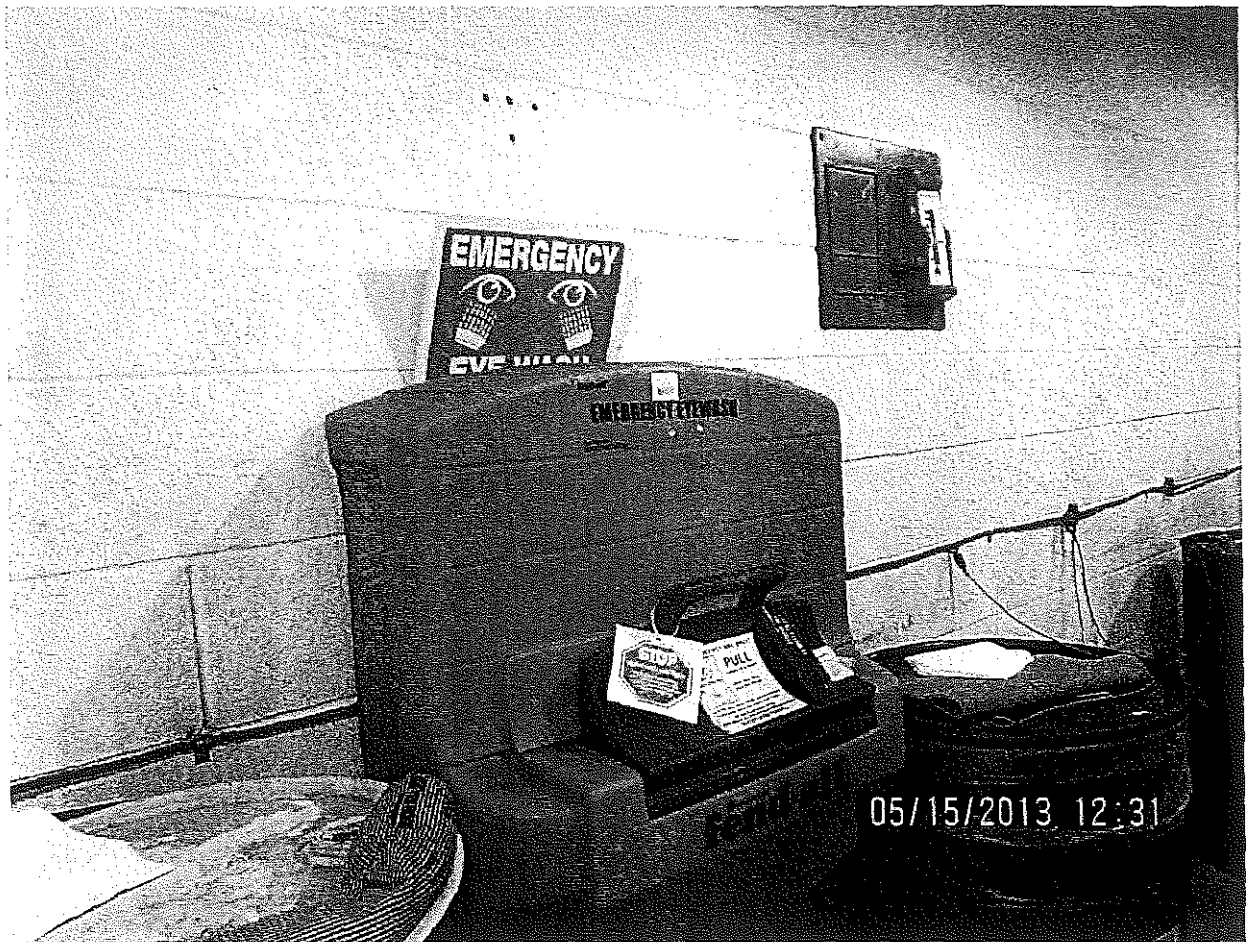
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Hazardous Waste Building

Description: Universal waste marked and labeled at time of inspection

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #53

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: Picture of emergency equipment

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #54

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: Picture of emergency response

ATTACHMENT B

MPI Photograph Log

MID 048 989 891

Attachment B- MPI Research MID 048 989 891 Photograph Log**Photographer:** US EPA Inspector Cindy Dabner**Location:** 54943 North Main Street, Mattawan, MI 49071**Date(s):** May 15, 2013

Photo #	Description	Date
1	Photograph of the facility sign	May 15, 2013
2	A 55 gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area	May 15, 2013
3	A closer picture of the label of the 55 gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area	May 15, 2013
4	A picture of the room M-2116 sign where hazardous waste is stored in 5 gallon containers	May 15, 2013
5	A picture of the hazardous waste contained in containers ranging in various sizes in Room M-2116	May 15, 2013
6	A tray located on the floor of the Analytical Area holding 5 gallon containers labeled as "mixed organic waste."	May 15, 2013
7	A 55 gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.	May 15, 2013
8	A closer picture of the label on the 55 gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.	May 15, 2013
9	Description: A picture of the test article trays contained in photograph	May 15, 2013
10	A 55 gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.	May 15, 2013
11	A closer picture of the label of the 55 gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Lab Waste.	May 15, 2013
12	A picture of the contents of 55 gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.	May 15, 2013
13	A container was observed in room M-2514 marked as hazardous waste with D001 waste code	May 15, 2013
14	A closer picture of the 5 gallon container observed in room M-2514 marked as hazardous waste with D001 waste code.	May 15, 2013
15	Non-hazardous waste with contents marked as TOMTEC Tips in room M2467	May 15, 2013
16	A closer picture of the label of the 55 gallon drum marked as Non-hazardous waste with contents marked as TOMTEC Tips room M-2467	May 15, 2013

Photo #	Description	Date
17	Open 55 gallon drum marked universal pharmaceutical liquid in room M-2467	May 15, 2013
18	A closer picture of the Open 55 gallon drum marked universal pharmaceutical liquid	May 15, 2013
19	Two 55 gallon drums marked as universal pharmaceutical solids were observed closed in room M-2467	May 15, 2013
20	A closer picture of a 55 gallon drum marked as universal pharmaceutical solid was observed closed in room M-2467 of TMC	May 15, 2013
21	Two 5 gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes in room M-2514	May 15, 2013
22	Two 5 gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes in room M-2467	May 15, 2013
23	Four 5 gallon containers were observed marked as hazardous waste and labeled with D001 hazardous waste codes Plastics Rm F31	May 15, 2013
24	A closer picture of the 5 gallon container shown in photograph#23	May 15, 2013
25	A picture of the Drum Room	May 15, 2013
26	Chemical product stored in the Drum Room	May 15, 2013
27	A 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 in the Drum Room	May 15, 2013
28	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.	May 15, 2013
29	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 of the SSA of the Drum Room	May 15, 2013
30	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003	May 15, 2013
31	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 in the Drum Room	May 15, 2013
32	A 55 gallon drum was marked as non-hazardous waste containing formalin rags	May 15, 2013
33	A closer picture of the non-hazardous waste label taken in photograph #32	
34	A 55 gallon drum marked as hazardous waste flammable solids without accumulation start date	May 15, 2013
35	Top view of 55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid	May 15, 2013
36	55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid.	May 15, 2013
37	Hazardous waste label added to the 55 gallon drum in photo#193	May 15, 2013

Photo #	Description	Date
	during the inspection.	
38	A closer picture of the hazardous waste label added to the 55 gallon drum in photo#193 during the inspection.	May 15, 2013
39	Two 55 gallon drum observed not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
40	Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
41	Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
42	Top view of one drum shown in photo# 197	May 15, 2013
43	Drum identified in photo#198 labeled as a waste hydrochloric acid without hazardous waste codes was placed on during the inspection.	May 15, 2013
44	Container marked with accumulation start date	May 15, 2013
45	Hazardous Waste Storage Area	May 15, 2013
46	Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area	May 15, 2013
47	Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area	May 15, 2013
48	Container marked and labeled with the item of waste (acetone, xylene, methanol)	May 15, 2013
49	Container not marked and labeled with contents of waste (hydrochloric acid)	May 15, 2013
50	Container marked and labeled at the time of the inspection	May 15, 2013
51	Container not marked and labeled as universal waste lamps	May 15, 2013
52	Universal waste marked and labeled at time of inspection	May 15, 2013
53	Picture of emergency equipment	May 15, 2013
54	Picture of emergency response kit	May 15, 2013

ATTACHMENT C

DMEQ Fully Regulated Generator Inspection Checklist

MPI MID 048 989 891

**Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM**

Facility's Name MPI Research Part 3 Rules
Date May 15, 2013 ID# MID 048 989 891 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Hydrochloric Acid D002	Production Process Waste	
Sport Lab Solvents P003 D001	Laboratory Waste	
Formaldehyde D001, D002	Laboratory Waste	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

(NI = Not inspected; N/A = Not applicable)

		YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	<input type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	<input type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d): 40 CFR 268.7(a)(5))	262C	<input type="checkbox"/>	NI N/A
IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)			
3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	<input checked="" type="checkbox"/>	NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	<input checked="" type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:			
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
7. NOT APPLICABLE			
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3 rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	<input checked="" type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	<input checked="" type="checkbox"/>	NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	<input type="checkbox"/>	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).			
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:			
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:			
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input type="checkbox"/>	NI N/A
13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input type="checkbox"/>	NI N/A

**LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))**

	YES	NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	268A <input checked="" type="checkbox"/>	NI N/A
b) all characteristic wastes?	268A <input checked="" type="checkbox"/>	NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A <input type="checkbox"/>	NI N/A
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OR

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A <input type="checkbox"/>	NI N/A
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OR

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A <input type="checkbox"/>	NI N/A
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OR

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A <input type="checkbox"/>	NI N/A
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19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))		
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a) EPA hazardous waste #?	268A <input type="checkbox"/>	NI N/A
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b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A <input type="checkbox"/>	NI N/A
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c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A <input type="checkbox"/>	NI N/A
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d) manifest number associated with the shipment?	268A <input type="checkbox"/>	NI N/A
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e) waste analysis data, where available?	268A <input type="checkbox"/>	NI N/A
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f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A <input type="checkbox"/>	NI N/A
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UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A <input type="checkbox"/>	NI N/A
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h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A <input type="checkbox"/>	NI N/A
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20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3))		
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a) if the notice is for shipments that meet the standards does the notice include the certification?	268A <input type="checkbox"/>	NI N/A
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b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A <input type="checkbox"/>	NI N/A
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NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	268A <input checked="" type="checkbox"/>	NI N/A
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22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR 268.7(a)(7))	268A <input type="checkbox"/>	NI N/A
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23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	268A <input checked="" type="checkbox"/>	NI N/A
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NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A <input checked="" type="checkbox"/>	NI N/A
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TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR 268.40(c))	268A <input type="checkbox"/>	NI N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D <input checked="" type="checkbox"/>	NI N/A
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27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D <input checked="" type="checkbox"/>	NI N/A
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PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

		YES	NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30))	262C	<input checked="" type="checkbox"/> co.said	<input type="checkbox"/> obsrvd NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR 172 concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	<input checked="" type="checkbox"/> co.said	<input type="checkbox"/> obsrvd NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	<input checked="" type="checkbox"/> co.said	<input type="checkbox"/> obsrvd NI N/A
31. If required (>1000 #s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	<input checked="" type="checkbox"/>	NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)			
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	<input checked="" type="checkbox"/>	NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	<input checked="" type="checkbox"/>	NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	<input checked="" type="checkbox"/>	NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	262C	<input checked="" type="checkbox"/>	NI N/A

OR

e) one of the following apply:			
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	<input type="checkbox"/>	NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7): 40 CFR 262.34(g))	262C	<input type="checkbox"/>	NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8): 40 CFR 262.34(h))	262C	<input type="checkbox"/>	NI N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10): 40 CFR 262.34(i))	262C	<input type="checkbox"/>	NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	<input checked="" type="checkbox"/>	NI N/A
g) are containers compatible with waste in them (265.172)	262C	<input checked="" type="checkbox"/>	NI N/A
h) are containers stored closed? (265.173(a))	262C	<input checked="" type="checkbox"/>	NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	<input checked="" type="checkbox"/>	NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	<input checked="" type="checkbox"/>	NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	<input checked="" type="checkbox"/>	NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/>	NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/>	NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	<input checked="" type="checkbox"/>	NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	<input checked="" type="checkbox"/>	NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	<input checked="" type="checkbox"/>	NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:			
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/>	NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/>	NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	<input checked="" type="checkbox"/>	NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	<input checked="" type="checkbox"/>	NI N/A
e) are container(s) in good condition? (265.171)	262C	<input checked="" type="checkbox"/>	NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	<input checked="" type="checkbox"/>	NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	<input checked="" type="checkbox"/>	NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:			
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	<input type="checkbox"/>	NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	<input type="checkbox"/>	NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include			
a) impervious base free of cracks? (264.175(b)(1)) :	262C	<input type="checkbox"/>	NI N/A

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	<input type="checkbox"/>	NI	N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	<input type="checkbox"/>	NI	N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	<input type="checkbox"/>	NI	N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	262C	<input type="checkbox"/>	NI	N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	<input type="checkbox"/>	NI	N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>Explain any yes answer.</i>			NI	N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	<input type="checkbox"/>	NI	N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	<input type="checkbox"/>	NI	N/A
40. Is hazardous waste accumulated in tanks? <i>If so, complete Tank System inspection form.</i>			NI	N/A
41. Is hazardous waste placed on drip pads? <i>If so, complete Wood Preserving inspection form</i>			NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	262C	<input checked="" type="checkbox"/>	NI	N/A
43. Do personnel training records contain the following:				
a) job title? (265.16(d)(1))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) job descriptions? (265.16(d)(2))	262C	<input checked="" type="checkbox"/>	NI	N/A
c) name of employee filling each job? (265.16(d)(1))	262C	<input checked="" type="checkbox"/>	NI	N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	<input checked="" type="checkbox"/>	NI	N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))	262C	<input checked="" type="checkbox"/>	NI	N/A
f) records of training? (265.16(d)(4))	262C	<input checked="" type="checkbox"/>	NI	N/A
g) do new personnel receive required training within 6 months? (265.16(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	<input checked="" type="checkbox"/>	NI	N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	<input checked="" type="checkbox"/>	NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	<input checked="" type="checkbox"/>	NI	N/A
45. If required, does this facility have the following:				
a) internal communications or alarm systems? (265.32(a))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	<input checked="" type="checkbox"/>	NI	N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	<input checked="" type="checkbox"/>	NI	N/A
46. Testing and Maintenance of Emergency Equipment				
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	<input checked="" type="checkbox"/>	NI	N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable only if required (40 CFR 265.32)				
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	<input type="checkbox"/>	NI	N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	<input type="checkbox"/>	NI	N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	<input checked="" type="checkbox"/>	NI	N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	<input checked="" type="checkbox"/>	NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
49. Does the contingency plan contain the following:				
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	<input checked="" type="checkbox"/>	NI	N/A

ATTACHMENT D

MDEQ Universal Waste Small Quantity Handler (SQH) Inspection Checklist

MID 048 989 891

ATTACHMENT E

MPI Supporting Documentation Log

MID 048 989 891

Attachment E- MPI Inspection Documentation Log MID 048989891

Inspection Date: May 15, 2013

Generator Waste Profile Batteries Universal Waste
Land Disposal Restriction for F003 Acetone, Ethyl Acetate, Methanol and D001 Ignitable 005463987FLE
July 2007 MDEQ Subject: MPI Letter of Warning
May 4, 2007 MDEQ Subject: MID048989891
August 21, 2007 MPI Subject: Response to MDEQ Letter of Warning to MPI
Site Identification Verification Form Signed 4/19/2013
Site Identification Verification Form Signed 2/29/2012
Hazardous Waste Manifest#009785543JJK 4/26/2012
Hazardous Waste Manifest#004020555FLE 9/13/2011
Hazardous Waste Manifest#004036116FLE 9/13/2011
Hazardous Waste Manifest#004037131FLE 12/08/2011
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004777046JJK 2/8/11
Hazardous Waste Manifest#004777046JJK 2/14/2011
Hazardous Waste Manifest#003274001JJK 8/24/2011
Hazardous Waste Manifest#003274361JJK 12/14/2011
Fiscal Year 2011 Hazardous Waste User Charge Invoice
Site Identification Verification Form Signed 4/25/2011
Hazardous Waste Manifest#004778189JJK 2/16/2010
Hazardous Waste Manifest#004778402JJK 10/05/2010
Hazardous Waste Manifest#002380589FLE 10/15/2010
Hazardous Waste Manifest#004007115FLE 12/13/2010
Hazardous Waste Manifest#004007115FLE 12/13/2010
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004007115FLE 12/13/10
Hazardous Waste Manifest#003274001JJK 8/24/2011
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004007115FLE 12/13/10
Hazardous Waste Manifest#002380589FLE 10/15/2010
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids, D003, D009, D004, U006, D011 Manifest Document #002380589FLE 10/15/10
DLD Drug and Laboratory Disposal Invoice 11/11/2010

**Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER
(SQH) INSPECTION**

Facility Name MPI Research Part 2 Rules
Date May 15, 2013 I.D. # MID 048 989 891 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

		YES	NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	<input checked="" type="checkbox"/>	NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	<input type="checkbox"/>	NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4))

QTY HANDLED:

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	<input checked="" type="checkbox"/>	NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	<input checked="" type="checkbox"/>	NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.B	<input checked="" type="checkbox"/>	NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	<input checked="" type="checkbox"/>	NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(iii))	273.B	<input checked="" type="checkbox"/>	NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) requirements)

QTY HANDLED:

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a))	273.B	<input checked="" type="checkbox"/>	NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	<input checked="" type="checkbox"/>	NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	<input checked="" type="checkbox"/>	NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input checked="" type="checkbox"/>	NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input checked="" type="checkbox"/>	NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input checked="" type="checkbox"/>	NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	<input checked="" type="checkbox"/>	NI N/A

CONSUMER ELECTRONICS: (Rule 228(4))

QTY HANDLED:

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	<input checked="" type="checkbox"/>	NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	<input checked="" type="checkbox"/>	NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.B	<input checked="" type="checkbox"/>	NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse (Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii); remove modular components for reuse (Rule 228(4)(g)(iii))	273.B	<input checked="" type="checkbox"/>	NI N/A

ELECTRIC LAMPS: (Rule 228(4) ; 273.13(c); 273.14(d))**QTY HANDLED:**

17. Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(i)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4)(c)(ii))	273.B	<input checked="" type="checkbox"/> NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(4)(c)(iv)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii)(B)) <i>Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste</i>	273.B	<input checked="" type="checkbox"/> NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451; 40 CFR Part 260-272?	273.B	<input checked="" type="checkbox"/> NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	<input checked="" type="checkbox"/> NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14**QTY HANDLED:**

22. Are devices managed to prevent releases? (Rule 228 (4)(d); 40 CFR 273.13(c))	273.B	<input checked="" type="checkbox"/> NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d); 40 CFR 273.13(c)(1))	273.B	<input checked="" type="checkbox"/> NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)". (Rule 228 (4)(d); 40 CFR 273.14(d))	273.B	<input checked="" type="checkbox"/> NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d); 40 CFR 273.13(c)(2)(i & ii))	273.B	<input checked="" type="checkbox"/> NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d); 40 CFR 273.13(c)(2)(iii & iv))	273.B	<input checked="" type="checkbox"/> NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d); 40 CFR 273.13(c)(2)(v))	273.B	<input checked="" type="checkbox"/> NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d); 40 CFR 273.13(c)(2)(vi))	273.B	<input checked="" type="checkbox"/> NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d); 40 CFR 273.13(c)(2)(vii))	273.B	<input checked="" type="checkbox"/> NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d); 40 CFR 273.13(c)(2)(viii))	273.B	<input checked="" type="checkbox"/> NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d); 40 CFR 273.13(c)(3))	273.B	<input checked="" type="checkbox"/> NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d); 40 CFR 273.13(c)(3)(i)(A&B), 273.13(c)(4)(i))	273.B	<input checked="" type="checkbox"/> NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d); 40 CFR 273.13(c)(4)(ii))	273.B	<input checked="" type="checkbox"/> NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d); 40 CFR 273.13(c)(4)(iii))	273.B	<input checked="" type="checkbox"/> NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)**QTY HANDLED:**

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a); 40 CFR 273.13(b)(1))	273.B	<input checked="" type="checkbox"/> NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a); 40 CFR 273.13(b)(2))	273.B	<input checked="" type="checkbox"/> NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(4)(a); 40 CFR 273.13(b)(3))	273.B	<input checked="" type="checkbox"/> NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a); 40 CFR 273.13(b)(4))	273.B	<input checked="" type="checkbox"/> NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(S)" or "WASTE-PESTICIDE(S)" (Rule 228(4)(a); 40 CFR 273.14(b) [See 273.14(c) if 273.14(b) not possible]	273.B	<input checked="" type="checkbox"/> NI N/A

PHARMACEUTICALS: (Rule 228(4))**QTY HANDLED:**

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	<input checked="" type="checkbox"/> NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	<input checked="" type="checkbox"/> NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (iii))?	273.B	<input type="checkbox"/> <u>NI</u> N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16)) <i>must</i>	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
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RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	<input type="checkbox"/> <u>NI</u> N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	<input type="checkbox"/> <u>NI</u> N/A
45. If the SQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	<input type="checkbox"/> <u>NI</u> N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	<input type="checkbox"/> <u>NI</u> N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2))	273.B	<input type="checkbox"/> <u>NI</u> N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	<input type="checkbox"/> <u>NI</u> N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a): 40 CFR 273.18(g))	273.B	<input type="checkbox"/> <u>NI</u> N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	<input type="checkbox"/> <u>NI</u> N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 & 6) and (b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	<input type="checkbox"/> <u>NI</u> N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [N/N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [N/N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[] ___	N/N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[] ___	N/N/A
57. Does transporter comply w/ USDOT requirements for package/labels/markings/placards/shipping papers if universal waste is also hazardous material? <i>Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name.</i> (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[] ___	N/N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[] ___	N/N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a))	273.D	[] ___	N/N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[] ___	N/N/A

COMMENTS:

[illegible]

Hazardous Waste Manifest#005463987FLE 03/13/2013
Hazardous Waste Manifest#005463988FLE 03/12/2013
Hazardous Waste Manifest#005463989FLE 03/12/2013
Hazardous Waste Manifest#005467306FLE 03/13/2013
Land Disposal Notification Certification for D001, D002, U188, U123 Manifest Document #005463988FLE 3/13/13
Hazardous Waste Manifest#009465498JJK 11/11/2012
Land Disposal Notification Certification for F003 and D001 Manifest Document #0040446561FLE
Land Disposal Notification Certification for D001, D002, D003, D007, D011, and P105 Manifest Document #004037130FLE 3/5/12
DLD Drug and Laboratory Disposal Invoice 05/09/2012
Hazardous Waste Manifest#004046561FLE 03/05/2012
Hazardous Waste Manifest#004037130FLE no DF signature
Hazardous Waste Manifest#009465498JJK 01/11/2012
DLD Drug and Laboratory Disposal Invoice 11/09/2011
Hazardous Waste Manifest#004020555 09/13/2011
Hazardous Waste Manifest#004036116 09/13/2011
Land Disposal Notification Certification for D001, D002, F003 Manifest Document #004036116FLE 09/13/11
Generator Waste Profile Form Spent Laboratory Solvents (Bulk)
Land Disposal Notification Certification for D001, D002, F003 Manifest Document #004020555FLE 9/13/11

ATTACHMENT F
MPI Post-Inspection Log
MID 048 989 891

Attachment F- MPI Post-Inspection Documentation Log MID048989891

Inspection Date: May 15, 2013

Description
1# Site Map Facility Relative to Surrounding Area
2# Outdoor Chemical Storage Area Overview
3# Indoor Chemical Storage Area Overview
4# Outdoor Chemical Storage Area Overview
5# Site Plan, Indoor Chemical Storage Pictures
POL-DRP5 PDF Effective 03/01/13
Pollution Incident Prevention Plan 2013 Spill Contingency Plan for MPI Research
POL-SHE-17 MPI Response Emergency Action Plan (EAP)
Waste Handling Training Matrix
Generator Waste Profile Form (Absorbents with Formalin- Debris Rags/Materials containing Formalin)
Generator Waste Profile Form (Formaldehyde D001 and D002)
Generator Waste Profile Form (Hydrochloric Acid D002)
Generator Waste Profile Form (Spent Laboratory Solvents Xylene, Alcohol F003, D001)
Generator Waste Profile Form (Spent Oil for Equipment)
Exylim Weekly Report 2011-2013 Hazardous Waste Building
Exylim Weekly Report 2011-2013 EZA
IMG 163
IMG 174
IMG178
IMG163
Lion RCRA Training 030912
RCRA Waste Management Training Listing
Waste Handling Overview and Safety 042913
Attachment#1 Site Map
Attachment#2 Site Map
Attachment#3 Site Map
Attachment#4 Site Map
Attachment#5 Site Map
POL DPR 6-Corporation Disaster Recovery Hazardous Materials Plan 03-01-13
Pollution Incident Prevention Plan June 2013
POL SHE 17 Emergency Plan
Waste Handler Training Matrix
Waste Profile Absorbent with Formalin
Waste Profile Formaldehyde
Waste Profile Hydrochloric Acid
Waste Profile Lab Waste (alcohol)
Waste Oil
MPI Evaluation Observation
Exylim Evaluation Observation 2011-2013
Supplemental Training Records

Description
Excel RCRA Waste Management Training
Waste Handling Overview
Image Photo#163
Image Photo#174
Image Photo#178
Image Photo#163

LAND AND CHEMICALS DIVISION

Type of Document: RTC

Name of Document: MPI Research RTC

AUTHOR: Cindy Dabner Feb 17, 2015

SECTION APA: _____

SECTION CHIEF: Imorris Jr 2/17/15

BRANCH APA: _____

BRANCH CHIEF: Gregory W. Victorine 3/6/15

DIVISION APA: _____

DIVISION DIRECTOR: _____

OTHERS: _____

DRA: _____

RA: _____

RETURN TO: _____

PHONE: _____

COMMENTS: _____

CND
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CND
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5/10
2/21

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Chicago, Illinois 60604
Attn: Gaye Cuerington - CD

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DIVISION FRONT OFFICE

MAR 13 2015

LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5



SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1



Mr. Richard Granberg
MPI Research
54943 North Main Street
Mattawan, Michigan 49071

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

[Handwritten Signature]

☒ Agent

☐ Addressee

B. Received by (Printed Name)

Joel Hernandez

C. Date of Delivery

3/11/15

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If delivery address below:

☒ No

Mail

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☐ Return Receipt for Merchandise

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☐ C.O.D.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 09 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL #70091680000076625784
RETURN RECEIPT REQUESTED

Mr. Richard Granberg
Safety, Health and Environmental Compliance Officer
MPI Research
54943 North Main Street
Mattawan, Michigan 49071

Re: Notice of Violation
Compliance Evaluation Inspection
MID 048 989 891

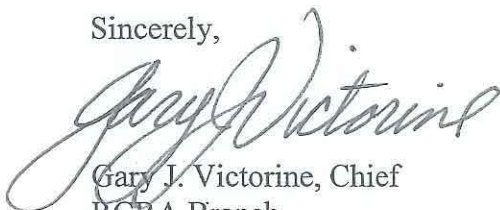
Dear Mr. Granberg:

On May 15, 2013, a representative of the U.S. Environmental Protection Agency inspected MPI Research located in Mattawan, Michigan. In response to violations of certain requirements of the United States Code of Federal Regulations (C.F.R.) and the Michigan Administrative Code (MAC) identified during the inspection, we issued a Notice of Violation to you on December 23, 2014. Subsequent to our Notice of Violation you submitted additional information regarding the identified violations.

This letter is to inform you that EPA has reviewed the referenced responses and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Michigan Department of Environmental Quality will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Ms. Cindy Dabner, of my staff, at dabner.cindy@epa.gov or 312-886-5890.

Sincerely,


Gary J. Victorine, Chief
RCRA Branch

cc: John Craig, MI DEQ, craigj@michigan.gov
Lonnie Lee, MI DEQ, leel@michigan.gov



54943 North Main Street
Mattawan, MI 49071 USA
Tel: +1.269.668.3336
Fax: +1.269.668.4151

Ms. Cindy Dabner
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604

January 20, 2015

Re: Notice of Violation
Compliance Evaluation Inspection
MID 048 989 891

Dear Ms. Dabner,

This letter is in response to the above-referenced Notice of Violation received at MPI Research on December 23, 2014. Its purpose is to explain MPI Research compliance status with respect to the large quantity generator license exemption conditions and the generator requirements discussed, and to specifically discuss actions taken with respect to paragraphs 3, 4, 5, and 7 of the above referenced Notice of Violation.

MPI Research is currently in compliance with all of the large quantity generator license exemption conditions and the generator requirements discussed, including the listing of accumulation start dates for universal waste as discussed in paragraph 8.

With respect to paragraph 3, Contingency Plan and Emergency Procedures:

A list of qualified Emergency Coordinators, including names, addresses, and home/office phone numbers, listed in order in which they will assume responsibility, is included as section 2 of the MPI Research Pollution Incident Prevention Plan (PIPP), which is the Spill Contingency Plan for MPI Research. The current revision of the PIPP up through section 2 is included as Attachment 1 to this letter. Note that the PIPP is not included within the MPI Research Emergency Action Plan for reasons of procedural clarity, but is the referenced document that is followed for hazardous materials/hazardous waste emergency response in conjunction with the Emergency Action Plan. The Emergency Coordinator discussed herein is a member of the Incident Command Team as described in the MPI Research Emergency Action Plan, for situations where the Incident Command Team is activated in conjunction with a hazardous materials management incident.

With respect to paragraph 4, Preparedness and Prevention:

Shortly after completion of the inspection of May 15, 2013, notification letters were sent to local medical and emergency response agencies detailing the types of wastes stored and handled at MPI Research, the possible resulting illnesses and injuries (if applicable depending on the agency), and the types of information/assistance MPI Research could provide in a response situation. These letters were sent on June 21, 2013. Copies of these letters are included as Attachment 2. Updated letters were recently sent to the same agencies.

With respect to paragraph 5, Training:

MPI Research maintains job titles and written job descriptions for each position involved in hazardous waste management or hazardous waste handling. Lists of individuals currently qualified for each position, along with documentation of current training, are maintained, as well as documentation of previous training for prior years in which individuals served in such positions. The current system of training documentation ensures that individuals who do not have current required training for their listed job title are removed from the list of qualified personnel and are not allowed to perform duties associated with that job until they have successfully completed training. Attachment 3 is a description of MPI Research hazardous waste management job titles, job descriptions, and training content.

With respect to paragraph 7, Hazardous Waste Determination:

As noted, completed hazardous waste determinations were provided on June 28, 2013. MPI Research continues to perform hazardous waste determinations as required, and maintains completed hazardous waste determinations on site for the time period required.

Please contact me at 269-668-3336, ext. 2050 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Granberg', with a stylized flourish at the end.

Richard Granberg
Associate Director - Safety, Health, and Environmental Compliance
MPI Research, Inc.
269-668-3336 ext. 2050
richard.granberg@mpiresearch.com

Attachment 1

Pollution Incident Prevention Plan

MPI Research, Inc.
Mattawan, MI



54943 North Main Street
Mattawan Michigan 49071-9399
Phone: (269) 668-3336
www.mpiresearch.com

Revised January 2015

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1. Purpose and Scope

This document contains the spill contingency plan for MPI Research, Inc., in Mattawan, Michigan, as required by the Michigan Department of Environmental Quality (MDEQ) Part 5 rules concerning spillage of oil and polluting materials. This facility is not subject to the Spill Prevention Countermeasure and Control Plan requirements of the Federal Clean Water Act because the site does not threaten navigable waters in any way.

The plan provides specific instructions and procedures for internal reporting of chemical spills, facility and contact information, specific areas of concern for spills, spill control, equipment and cleanup, and off-site reporting, notification and contact information.

The plan coincides and is to be used in conjunction with associated MPI policies:

- APX-SHE-1, Sources of Mercury
- APX-SHE-3, Emergency Equipment List
- APX-SHE-4, Flammable and Combustible Liquids Quantity Limits
- FORM-SHE-73, Eyewash/Drench Shower Inspections (locations listed)
- POL-DRP-6, Corporate Disaster Recovery Plan: Hazardous Materials Plan
- POL-SEC-13, Hazardous Materials Transportation Security Plan
- POL-SHE-3, Chemical Hygiene Program
- POL-SHE-7, Mercury Control Program
- POL-SHE-14, Fire Protection Program
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- POL-SHE-37, Material Safety Data Sheet (MSDS) Administration and Employee Information and Training
- POL-SHE-55, Radiation Safety Plan – Storage and Control of Licensed Materials
- POL-SHE-58, Radioactive Waste Disposal

2. Emergency Coordinator Contact Information

Richard Granberg	Nonresponsive Nonresponsive	Home: Nonresponsive	Work: Ext. 2050	Cell: Nonresponsive
Terron McLean	Nonresponsive Nonresponsive	Home: Nonresponsive	Work: Ext. 1178	Cell: Nonresponsive
Bruce Van Scoy	Nonresponsive Nonresponsive	Home: Nonresponsive	Work: Ext. 2417	Cell: Nonresponsive

Attachment 2



54943 North Main Street
Mattawan, MI 49071-8353 USA
Telephone: +1 269.668.3336
Fax: +1 269.668.4151

June 21, 2013

Emergency Care Services
Bronson LakeView Hospital
408 Hazen Street
Paw Paw, MI 49079

To Whom It May Concern,

As a fully-regulated generator of hazardous waste, MPI Research, Inc. is required to make arrangements with local police, fire, emergency response teams and hospitals that may be called upon in the event of a fire, explosion or release of hazardous chemicals/waste and for potential resulting injuries and illnesses.

MPI Research utilizes numerous hazardous chemicals throughout the facility in laboratory and building maintenance processes. Wastes from many of these processes are collected and staged for removal, treatment and disposal by an off-site disposal service. Hazards from chemicals and wastes at MPI Research may include:

- Highly toxic and unknown (experimental) toxicity levels
- Potentially infectious (BSL-1 or BSL-2 only)
- Flammable liquids and vapors
- Corrosive liquids and vapors
- Cryogenic gas/liquid

Resulting injuries and illnesses may include:

- Acute poisoning
- Anaphylaxis
- Eye, skin, mucous membrane damage from fire, chemical or cryogenic burns
- Respiratory difficulties, damage, asphyxiation
- Infectious disease (CHV1 and others)

In the event sick or injured personnel are sent to your facility for treatment as a result of chemical exposure, Safety Data Sheets (SDSs) can be provided for all commercially available products. For exposure to compounds experimental in nature, all possible efforts will be made to provide any available information.

If you have questions regarding this please contact me at 269-668-3336 ext. 2050, or at my cell phone,

Nonresponsive

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Granberg', written over a horizontal line.

Richard Granberg
Senior Safety Specialist
MPI Research, Inc
269-668-3336 Ext. 2050
richard.granberg@mpiresearch.com



54943 North Main Street
Mattawan, MI 49071-8353 USA
Telephone: +1 269.668.3336
Fax: +1 269.668.4151

June 21, 2013

Emergency Care and Trauma Services
Bronson Methodist Hospital
601 John St.
Kalamazoo, MI 49007

To Whom It May Concern,

As a fully-regulated generator of hazardous waste, MPI Research, Inc. is required to make arrangements with local police, fire, emergency response teams and hospitals that may be called upon in the event of a fire, explosion or release of hazardous chemicals/waste and for potential resulting injuries and illnesses.

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- Anaphylaxis
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- Respiratory difficulties, damage, asphyxiation
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If you have questions regarding this please contact me at 269-668-3336 ext. 2050, or at my cell phone,

Nonresponsive

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Granberg', written over a horizontal line.

Richard Granberg
Senior Safety Specialist
MPI Research, Inc.
269-668-3336 Ext. 2050
richard.granberg@mpiresearch.com



54943 North Main Street
Mattawan, MI 49071-8353 USA
Telephone: +1 269.668.3336
Fax: +1 269.668.4151

June 21, 2013

Emergency and Trauma Center
Borgess Medical Center
1521 Gull Rd.
Kalamazoo, MI 49048

To Whom It May Concern,

As a fully-regulated generator of hazardous waste, MPI Research, Inc. is required to make arrangements with local police, fire, emergency response teams and hospitals that may be called upon in the event of a fire, explosion or release of hazardous chemicals/waste and for potential resulting injuries and illnesses.

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- Flammable liquids and vapors
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- Cryogenic gas/liquid

Resulting injuries and illnesses may include:

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- Anaphylaxis
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If you have questions regarding this please contact me at 269-668-3336 ext. 2050, or at my cell phone,

Nonresponsive

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Granberg', written over a horizontal line.

Richard Granberg
Senior Safety Specialist
MPI Research, Inc.
269-668-3336 Ext. 2050
richard.granberg@mpiresearch.com



54943 North Main Street
Mattawan, MI 49071-8353 USA
Telephone: +1 269.668.3336
Fax: +1 269.668.4151

June 21, 2013

Van Buren County Health Department
57418 CR 681
Hartford, MI 49057

To Whom It May Concern:

As required by Part 5 administrative rules, this letter is intended notification that MPI Research, Inc. has an updated Pollution Incident Prevention Plant (PIPP). It is also intended to certify that MPI Research, Inc. at 54943 N Main Street is operating in accordance with Part 5 rules.

A copy of the updated PIPP is available upon request. If requested, a copy will be sent to you within 30 days of receiving request.

If you have questions regarding this please contact me at 269-668-3336 ext. 2050, or at my cell phone, **Nonresponsive**.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Granberg', with a long horizontal stroke extending to the right.

Richard Granberg
Senior Safety Specialist
MPI Research, Inc
269-668-3336 Ext. 2050
richard.granberg@mpiresearch.com



54943 North Main Street
Mattawan, MI 49071-8353 USA
Telephone: +1 269.668.3336
Fax: +1 269.668.4151

June 21, 2013

Chief Donald Verhage
Mattawan Police Department
24221 Front Avenue
Mattawan, MI 49071

Dear Chief VerHage,

As a fully-regulated generator of hazardous waste, MPI Research, Inc. is required to make arrangements with local police, fire, emergency response teams and hospitals that may be called upon in the event of a fire, explosion or release of hazardous chemicals/waste and for potential resulting injuries and illnesses.

MPI Research utilizes numerous hazardous chemicals throughout the facility in laboratory and building maintenance processes. Wastes from many of these processes are collected and staged for removal, treatment and disposal by an off-site disposal service. Hazards from chemicals and wastes at MPI Research may include:

- Highly toxic and unknown (experimental) toxicity levels
- Potentially infectious (BSL-1 or BSL-2 only)
- Flammable liquids and vapors
- Corrosive liquids and vapors
- Cryogenic gas/liquid

Please find enclosed Pollution Incident Prevention Plan (PIPP) detailing the facility layout, areas of spill/release concern, chemical inventory and storage areas.

If you have questions regarding this please contact me at 269-668-3336 ext. 2050, or at my cell phone,

Nonresponsive

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Granberg', with a long horizontal line extending to the right.

Richard Granberg
Senior Safety Specialist
MPI Research, Inc.
269-668-3336 Ext. 2050
richard.granberg@mpiresearch.com



54943 North Main Street
Mattawan, MI 49071-8353 USA
Telephone: +1 269.668.3336
Fax: +1 269.668.4151

June 21, 2013

Lt. Alain Svilpe
Van Buren Local Emergency Planning Committee
205 S. Kalamazoo St.
Paw Paw, MI 49079

Dear Lt. Svilpe:

As required by Part 5 administrative rules, this letter is intended notification that MPI Research, Inc. has an updated Pollution Incident Prevention Plant (PIPP). It is also intended to certify that MPI Research, Inc. at 54943 N Main Street is operating in accordance with Part 5 rules.

A copy of the updated PIPP is available upon request. If requested, a copy will be sent to you within 30 days of receiving request.

If you have questions regarding this please contact me at 269-668-3336 ext. 2050, or at my cell phone, **Nonresponsive**.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Granberg', with a long, sweeping horizontal line extending to the right.

Richard Granberg
Senior Safety Specialist
MPI Research, Inc
269-668-3336 Ext. 2050
richard.granberg@mpiresearch.com



54943 North Main Street
Mattawan, MI 49071-8353 USA
Telephone: +1 269.668.3336
Fax: +1 269.668.4151

June 21, 2013

Michigan Department of Environmental Quality
Kalamazoo District Office-Water Resource Division
7953 Adobe Road
Kalamazoo, MI 49009-5025

To Whom It May Concern:

As required by Part 5 administrative rules, this letter is intended notification that MPI Research, Inc. has an updated Pollution Incident Prevention Plant (PIPP). It is also intended to certify that MPI Research, Inc. at 54943 N Main Street is operating in accordance with Part 5 rules.

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If you have questions regarding this please contact me at 269-668-3336 ext. 2050, or at my cell phone, **Nonresponsive**

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Granberg".

Richard Granberg
Senior Safety Specialist
MPI Research, Inc
269-668-3336 Ext. 2050
richard.granberg@mpiresearch.com

MPI Research hazardous waste management job titles, job descriptions, and training content

The MPI Research Hazardous Waste Management program as established in POL-SHE-16 includes initial and annual refresher training for Hazardous Waste Handlers (HWH), Hazardous Waste Managers (HWM) and spill response personnel that is documented and maintained in a training records management system and maintained in the Safety, Health and Environmental Compliance files. The training descriptions under the Hazardous Waste management program (shown below) are those required for the positions of HWH and HWM. Safety, Health and Environmental Compliance maintains lists of those individuals currently qualified to perform the duties of HWH and HWM.

The HWH position is staffed by those individuals responsible for generating, collecting and/or moving waste determined to be hazardous or part of a restricted waste stream. The HWH will be provided with a basic understanding of environment regulatory compliance requirements. The HWH will further be trained in proper facility specific practices governing hazardous waste handling, accumulation, disposal, internal transport, proper labeling and safety practices, as well as emergency response and notification as required by the MPI Research Spill Contingency Plan (PIPP). This includes:

- emergency equipment, procedures, and systems
- facility emergency and monitoring equipment
- emergency response (fires or explosions)
- response to ground-water contamination incidents

This training is done on an annual basis (initial training, followed by annual refresher training) and also within 90 days of an individual assuming a position requiring performance of the duties of a HWH.

The HWM position is staffed by those individuals responsible for preparing and signing manifests, recordkeeping, and reporting, as well as program design and regulatory adherence. The personnel designated as HWM will receive detailed training on federal and state hazardous waste regulations, sufficient to provide detailed knowledge of state, federal and local regulations governing waste generation, storage, and disposal. They will also be trained in facility specific practices, as required by the MPI Research Spill Contingency Plan (PIPP). This includes:

- emergency equipment, procedures, and systems
- facility emergency and monitoring equipment
- emergency response (fires or explosions)
- response to ground-water contamination incidents

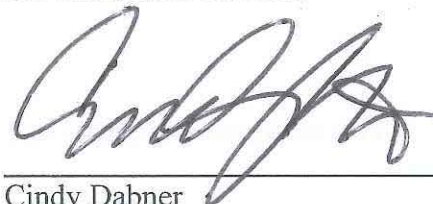
This training is done on an annual basis (initial training, followed by annual refresher training) and also within 90 days of an individual assuming a position requiring performance of the duties of a HWM.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR8J
77 WEST JACKSON BLVD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: MPI RESEARCH
EPA ID NUMBER: MID 048 989 891
ADDRESS: 54943 North Main Street, Mattawan, MI 49071
DATE OF INSPECTION: May 15, 2013
EPA INSPECTOR: Cindy Dabner
Environmental Scientist

PREPARED BY:


Cindy Dabner
Compliance Section 2

Nov 13, 2014
Date

ACCEPTED BY:


Julie Morris, Chief,
Compliance Section 2

11/28/14
Date

Purpose of the Inspection

This inspection was an evaluation of MPI Research's compliance with hazardous waste regulations found at Michigan Administrative Code (MAC) and Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a large quantity generator (LQG).

Participants

U.S. Environmental Protection Agency-

Cindy Dabner, U.S. EPA Inspector U.S. EPA Region 5
dabner.cindy@epa.gov
312-886-5890

Representatives of MPI Research-

Lisa B. Sexton, Manager, Safety, Health and Environmental Services
lisa.sexton@mpiresearch.com
269-668-3336 ext 1899

Richard Granberg, Senior, Safety, Health and Environmental Compliance Officer
richard.granberg@mipresearch.com
269-998-3336 ext. 2050

Mary Ann Scott, Senior Director Regulatory Compliance
maryann.scott@mpiresearch.com
269-668-3336 ext. 1273

Introduction

On May 15, 2013, Inspector Dabner arrived to the site at approximately 9:15 a.m. After checking in at the front office, the inspector was directed to Mrs. Lisa Sexton, the Manager, Safety, Health and Environmental Services. Inspector Cindy Dabner presented her federal identification and explained the purpose of the visit was to conduct a hazardous waste inspection.

During the opening conference, Inspector Dabner inquired about the required safety measures to conduct during the inspection tour. Mrs. Sexton requested that Inspector Dabner wear shoe covers, a laboratory jacket, and a radiation meter device.

Inspector Dabner discussed during the opening conference, confidential business information (CBI) and the use of a camera during the inspection. MPI Research did not make any CBI claims on: (1) the information provided to the inspector; or (2) photographs taken during the inspection. Inspector Dabner provided a Small Business Resources information Sheet and Pollution Prevention Brochure to Mrs. Sexton.

Site Description

MPI Research, Inc. is located in a large compound on the east side of Main Street, immediately south of the I-94 interchange in the Village of Mattawan, Michigan. MPI Research is privately held and not publicly traded. The company engages in non-clinical evaluation of pharmaceuticals, medical devices and consumer products on a global level. The facility consists of a number of interconnected buildings totaling approximately one million square feet of offices, laboratories and support facilities. There are several large employee parking areas around the structures and three storm water retention ponds located on the site. The facility employs approximately 1100 employees and operates using two shifts of employees and a skeleton crew for third shift.

The bulk of the hazardous waste generated at the facility is from analytical instruments waste reagents. The main waste streams generated at MPI Research consist of the following: (1) acetone, methanol (D001 and F003); (2) paraffin, xylene (D001 and F003); (3) hydrochloric acid (D001); (4) potassium hydroxides (D001 and F003); (5) potassium hydroxide; (6) formaldehyde; (7) hydrochloric acid; (8) xylene, alcohol; and (9) waste oil. The facility also generates universal waste. The universal waste includes batteries and fluorescent lamps.

Site Tour

Ms. Sexton escorted the inspector during the site inspection tour. The tour started in the Analytical Area. In this area, a high performance liquid chromatographer (HPLC) is used to separate, identify, and quantify the components in a test article. Once the process is complete, the test articles are disposed of as hazardous waste and the glass pipette tips are accumulated in 55-gallon containers. The inspector observed a 55-gallon plastic drum serving in satellite accumulation area (SAA) of the Analytical Area. The 55-gallon drum was observed marked as hazardous waste with hazardous waste codes D001 and D003 along with the DOT shipping information and UN number. See Photograph #2 and #3.

In Room M-2116 of the Analytical Area, the inspector observed multiple containers ranging in various sizes amounting to approximately 55-gallons. According to the facility representative, Room M-2116 serves as a satellite accumulation area (SAA). The containers contained organic bench waste obtained from the dilution of test articles with solvents. Each of the containers were marked as organic waste with waste code D001. The organic bench waste is later transferred and accumulated to a 55-gallon container that is located in another building over 300 feet away in the Hazardous Waste Building. See Photograph #4 and #5.

The inspector observed a tray located on the floor of the Analytical Area holding 5-gallon containers marked as "mixed organics" with hazardous waste code D001. The facility representative stated that the area on the floor serves as a SAA. According to the facility representative, once the 5-gallon containers are full, the hazardous waste is transferred to a 55-gallon drum serving as a SAA in another building over 300 feet away in the Hazardous Waste Building. See Photograph #6.

In the Instrument Area near room M-2117, the inspector observed a 55-gallon drum accumulating TOMTEC test article trays hazardous waste in the SAA. The 55-gallon drum was

observed marked as hazardous waste with waste codes D001 and F003 with the DOT shipping information and UN number. See Photograph #7, #8 and #9.

In the Bio-Analytical Area, the inspector observed a 55-gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Laboratory Waste. See Photograph #10, #11 and #12.

In Room M-2514 of the Test Material Control Area (TMC), ethanol is used to rinse glassware. Once the ethanol is used, it is accumulated in a 5-gallon container. A 5-gallon container was observed marked as hazardous waste with D001 waste code. According to the facility representative, once the 5-gallon container is full, the 5 gallon container is transferred to the SAA of the Hazardous Waste Building. See Photograph #13 and #14.

In Room M-2467 of the TMC, a 55-gallon drum was observed marked as non-hazardous waste with contents listed as TOMTEC Tips Trays. See Photograph #15 and #16.

Also in Room M-2467 of the TMC, a 55-gallon drum was observed marked as universal waste with contents described as pharmaceutical liquid. The container was observed opened and not marked to indicate the length of time the pharmaceutical liquid was stored. At the time of the inspection, no inventory system was declared to identify or demonstrate the earliest date the items became a universal waste. See Photograph #17 and #18. Photo does not include the accumulation date.

In a different area of M-2467 of the TMC, two 55-gallon drums were observed marked as universal waste with contents described as pharmaceutical solid. The containers were not marked to indicate the length of time the pharmaceutical liquid stored. At the time of the inspection, no inventory system was declared to identify or demonstrate the earliest date the items became a universal waste. See Photograph #19 and #20.

In Room M-2514, waste acetone is generated from glass washing operations. During the inspection, two 5-gallon containers storing acetone were observed not marked as hazardous waste and without hazardous waste codes. See Photograph #21. The two 5-gallon containers were marked and properly labeled at the time of the inspection. See Photograph #22.

In the Plastics Room F31, special stains are mixed. Excess stains are stored in 5-gallon containers. Four 5-gallon containers were observed not kept in good condition, but marked as hazardous waste and labeled with D001 hazardous waste codes. See Photograph #23 and #24.

The tour continued to the Drum Room. The Drum Room is located near three major laboratories and serves a SAA, 90-Day Accumulation Storage Area, and a Chemical Product Storage Area. See Photograph #25 and #26.

In the SAA of the Drum Room, a 55-gallon drum was observed marked as hazardous waste with hazardous waste codes D001 and F003. The DOT shipping information and UN number provided on the hazardous waste label. See Photograph #27, #28, #29, #30, and #31.

Also, in the Drum Room, a 55-gallon drum was observed marked as non-hazardous waste containing formalin rags. See Photograph #32 and #33.

A 55-gallon drum located in the 90 Day Accumulation Area of the Drum Room was observed marked as "hazardous waste flammable solids." The drum appeared to be full. No accumulation start date was provided on the drum. Hazardous waste codes were not observed marked on the hazardous waste label. See Photograph #34.

Another 55-gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid, but not as a hazardous waste with waste codes. See Photograph #35 and #36. The 55-gallon drum served as a SAA for one of the nearby Laboratories. A hazardous waste label marked with hazardous waste codes D001 and F003 was placed on the drum at the time of the inspection. The DOT shipping information and UN was also provided at the time of the inspection. See Photograph #37 and #38.

Also in the Drum Room, two 55-gallon drums were observed not marked as a hazardous waste or with hazardous waste codes. According to the facility representative, the two drums were being stored in the 90 Day Accumulation Area. One drum was only marked as a corrosive and the second drum was marked as a hydrochloric acid corrosive waste. See Photograph #39, #40, #41 and #42. Hazardous waste labels were applied to the two drums at the time of the inspection. The accumulation state date was written as 5/15/13 on both of the containers. See Photograph #43 and #44.

The tour moved to the Hazardous Waste Storage Building. See Photograph #45. This building serves as a 90 Day Accumulation Storage Area and SAA. Several 55-gallon drums were observed marked as hazardous waste with accumulation start dates less than 90 days and hazardous waste codes of D001 and F003. See Photograph #46 and #47.

In the SAA of the Hazardous Waste Storage Area, aerosol cans are punctured to remove product residue from maintenance products. The contents of the aerosol cans are accumulated in a 55-gallon drum that is marked as hazardous waste and with hazardous waste codes of D001 and D003. The DOT shipping and UN information is listed as a waste flammable liquid (acetone, xylene, methanol). See Photograph #48.

Also located in the 90 Day Hazardous Waste Storage Building, two plastic 55-gallon drums were observed. One drum was marked as a hazardous waste with an accumulation start date of 5/3/2013. The DOT shipping information was listed as potassium hydroxide. The second drum was observed marked only as a corrosive. No hazardous waste label with an accumulation start date was provided. See Photograph #49. A hazardous waste label was placed on the drum at the

time of the inspection with accumulation start date of 5/15/2013. The DOT shipping information was listed as waste hydrochloric acid was also provided at the time of the inspection. See Photograph #50.

Also in the Hazardous Waste Storage Area, used lamps were observed not labeled as universal waste lamps. See Photograph #51. A universal waste label was provided at the time of the inspection with the accumulation start date of 5/15/13. See Photograph #52.

During the inspection, the Inspector observed fire extinguishers, spill control equipment, internal communications systems, and alarm systems. See photographs #53 and #54. A list of emergency equipment at the facility including location, physical description and capabilities were not provided in the Pollution Incident Prevention Plan dated June 2013.

Record Review

A records review was conducted following the facility tour. The inspector requested to review hazardous waste determination documents, hazardous waste manifest, land disposal restriction (LDR) forms, universal waste documents, personnel training documents, weekly inspection logs, and personnel training records for the past three years. The Inspector reviewed hazardous waste profiles, hazardous waste manifest, land disposal restriction records, and universal waste shipping records during the inspection. Training records and contingencies plan were forwarded to the inspector following the inspection.

At the time of the inspection the generator status was determined to be a large quantity generator based on the amount of hazardous waste generated within one month.

Waste Determination Documents

Two incomplete hazardous waste determinations that were provided on-site at the time of the review. The following discrepancies were noted for the two hazardous waste determinations:

Generator Profile	Date of Notification	Waste Generating Process	Constituents and Waste Code	Observation
Spent Laboratory Waste	05/15/2013	Laboratory Waste	Xylene, alcohol D001 and F003	Generator Waste Profile Form Determination basis not marked as generator knowledge or analytical testing or both
Batteries (Universal Waste) Bulk	02/16/2012	Spent Batteries	Batteries Universal Waste	Determination basis not marked as generator knowledge or

Waste determinations were not provided on-site for the following waste:

TOMTEC Tips; debris formalin rags; laboratory waste containing formaldehyde; laboratory waste containing hydrochloric acid; laboratory waste containing alcohols; and potassium hydroxide waste.

Hazardous Waste Manifest

No concerns were observed in the review of the hazardous waste manifest.

Land Disposal Restriction Documents

No concerns were observed in the review of land disposal restriction documents.

Biennial Reporting Documents

No concerns were observed with biennial reporting requirements.

Container Weekly Inspections

At the time of the review, weekly inspection documentation was not provided for calendar year 2011, 2012 and 2013.

Personnel Training Documents

Personnel training records did not contain job titles and job descriptions. Based on the training records provided the following facility personnel have not been provided did not take part in annual training:

Larry McKee - calendar Year 2012

Richard Ganberg - calendar Year 2011 and 2013

Contingency Plan and Emergency Procedures

The name, address, and phone number (office and home) of emergency coordinator was not provided in the Emergency Action Plan.

Preparedness and Prevention

Coordination efforts with local emergency response agencies were not documented and provided during the review.

Universal Waste

Universal waste containers not kept closed and labeled with the earliest date the items became a universal waste.

Closing Conference

A closing conference was conducted with Mrs. Lisa B. Sexton, Mr. Richard Granberg, and Mrs. Mary Ann Scott. The Inspector summarized the areas of concern noted during the inspection. Inspector Dabner explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection. The inspection concluded at approximately 4:45 p.m.

Post-Inspection

Prior to completion of this inspection report, Lisa Sexton and Mr. Granberg provided Inspector Dabner supplemental information. Supplemental information is provided in Attachment F- MPI Post-Inspection Document Log.

Attachments

- A. MPI Research Inspection Photographs
- B. MPI Research Photograph Log
- C. MDEQ Fully Regulated Generator Inspection Checklist for MPI Research
- D. MDEQ Universal Waste Handler Inspection Report-Small Quantity Handler for MPI Research
- E. MPI Research Supporting Document Log
- F. MPI Research Post-Inspection Document Log

ATTACHMENT A
MPI Inspection Photographs
MID 048 989 891

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #1

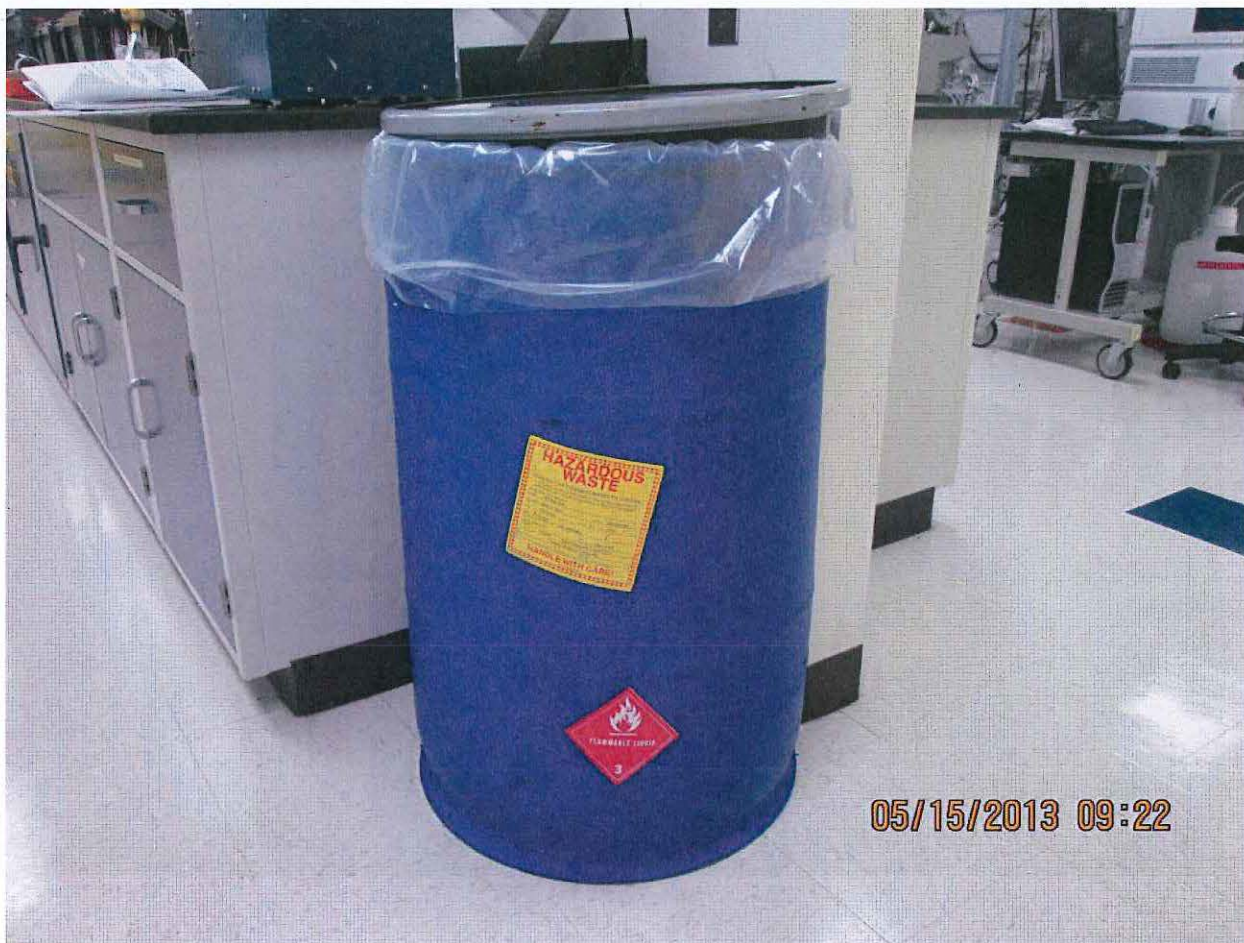
Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Description: Photograph of the facility sign

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #2

Name of Photographer: Cindy Dabner

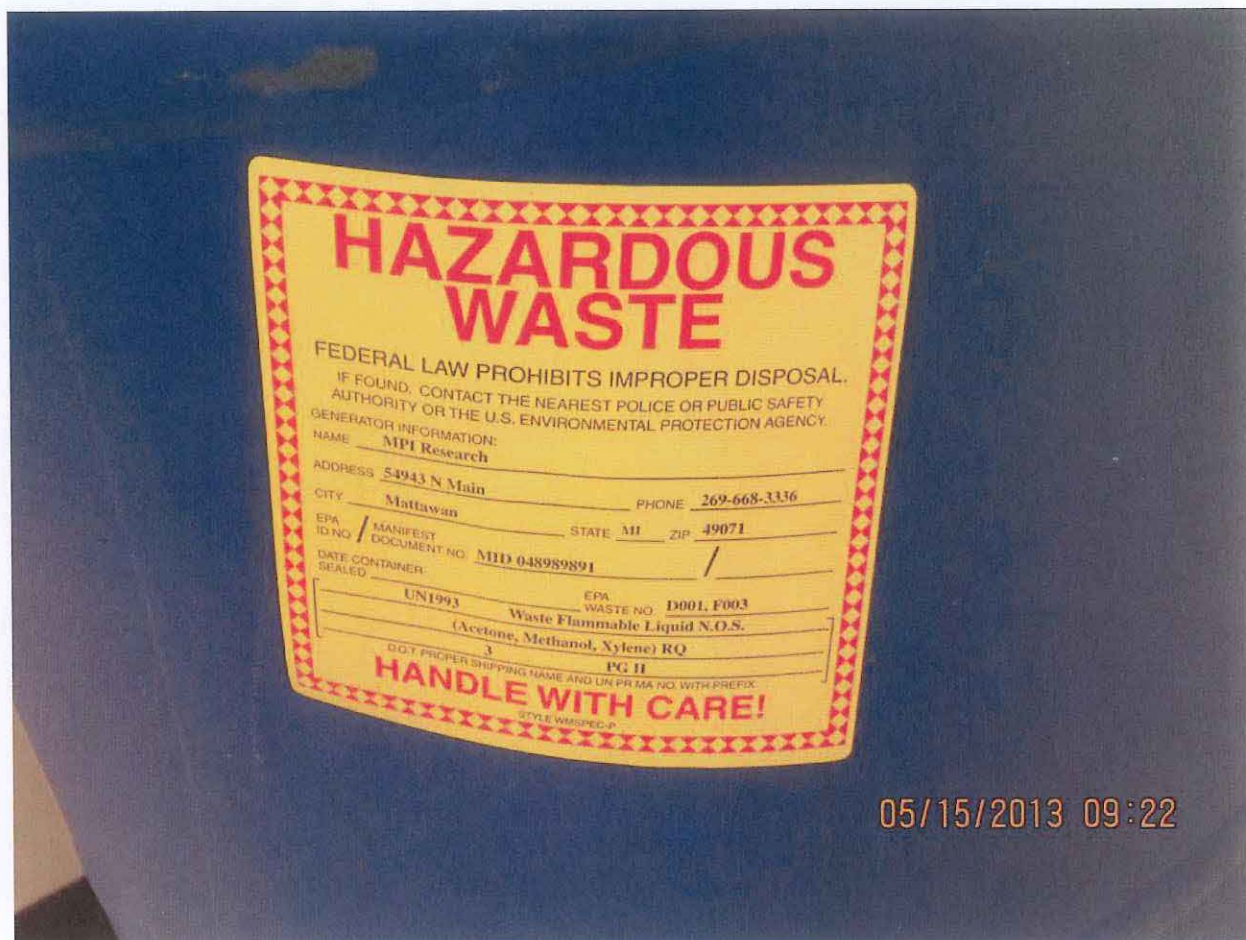
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area

Description: A 55-gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #3

Name of Photographer: Cindy Dabner

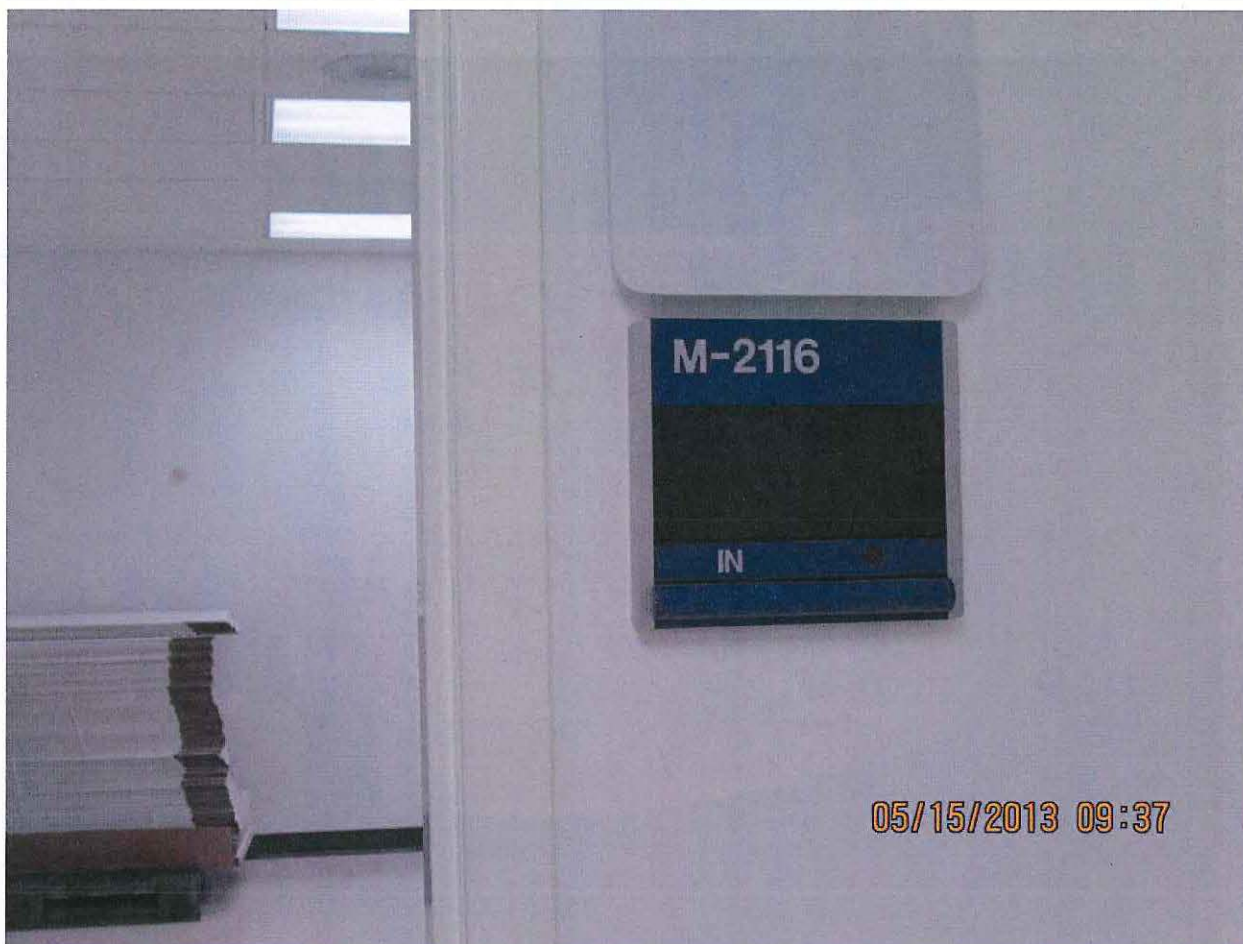
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area

Description: A closer picture of the label of the 55-gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #4

Name of Photographer: Cindy Dabner

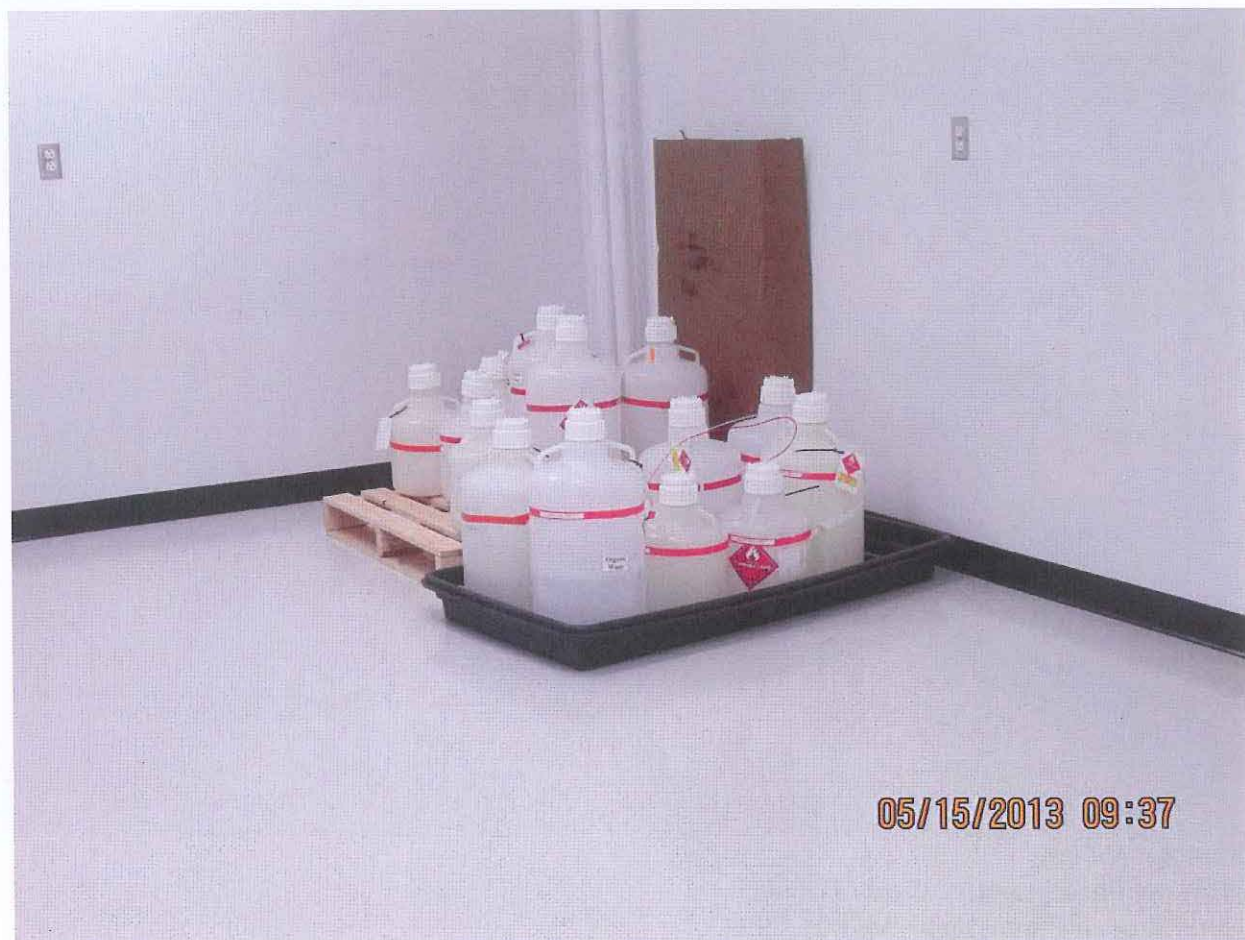
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area Room M-2116

Description: A picture of the room sign where hazardous waste is stored in 5-gallon containers.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #5

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area Room M-2116

Description: A picture of the hazardous waste contained in containers ranging in various sizes in Room M-2116.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #6

Name of Photographer: Cindy Dabner

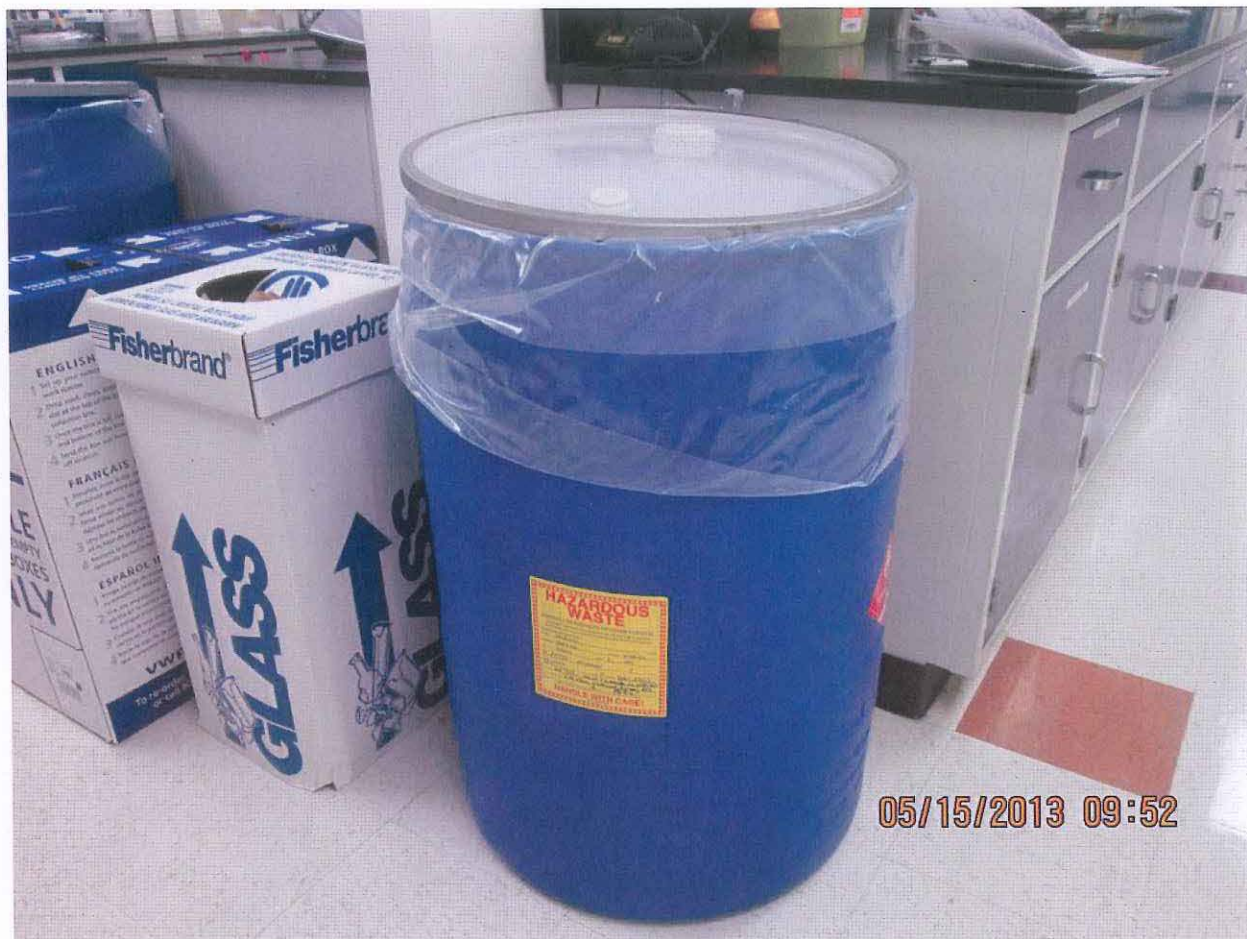
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area

Description: A tray located on the floor of the Analytical Area holding 5-gallon containers labeled as "mixed organic waste."

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #7

Name of Photographer: Cindy Dabner

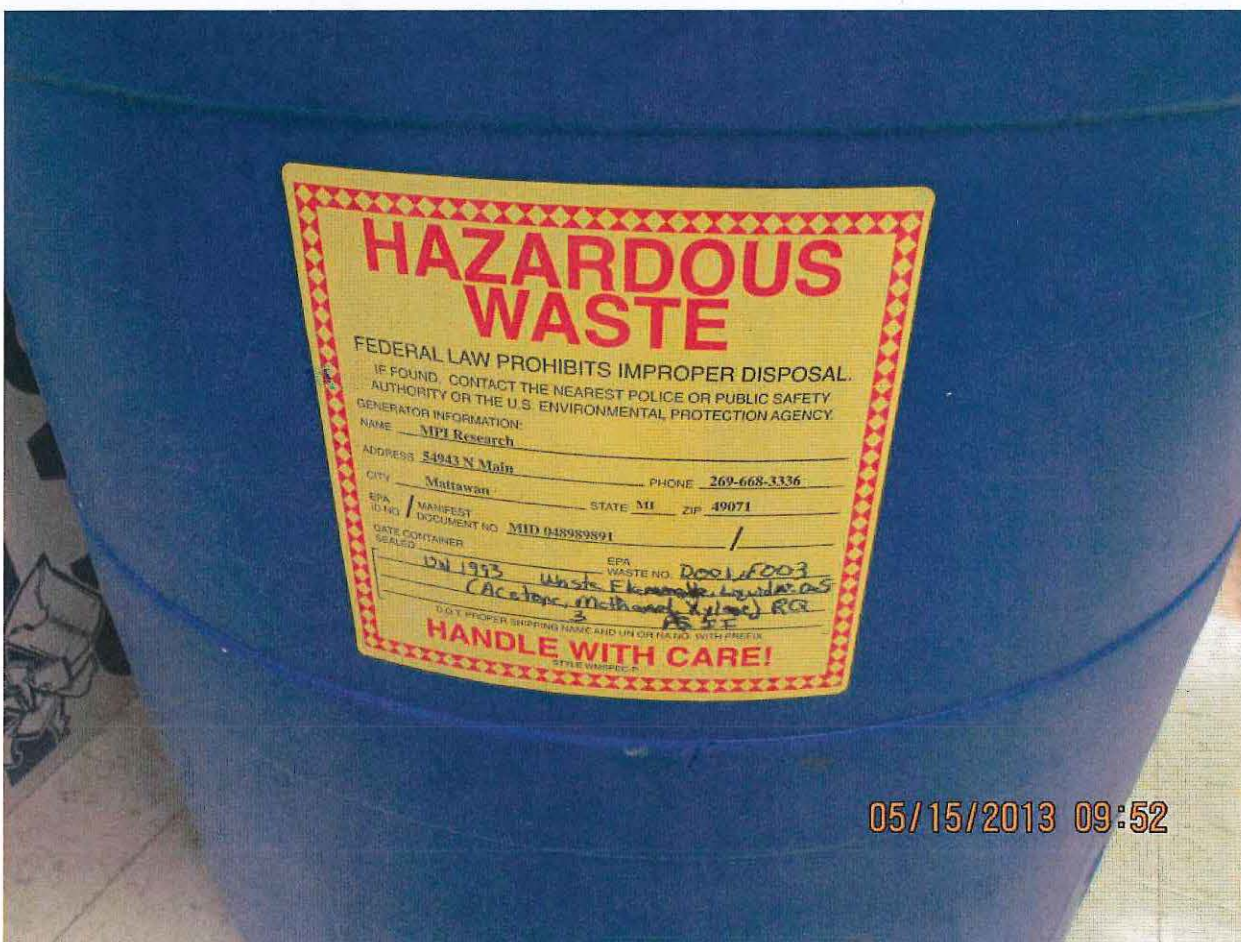
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Instrument Area Room M-2117

Description: A 55-gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #8

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area Instrument Area Room M-2117

Description: A closer picture of the label on the 55-gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #9

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Analytical Area Instrument Area Room M-2117

Description: A picture of the TOMTEC test article trays contained in photograph #7 and #8.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #10

Name of Photographer: Cindy Dabner

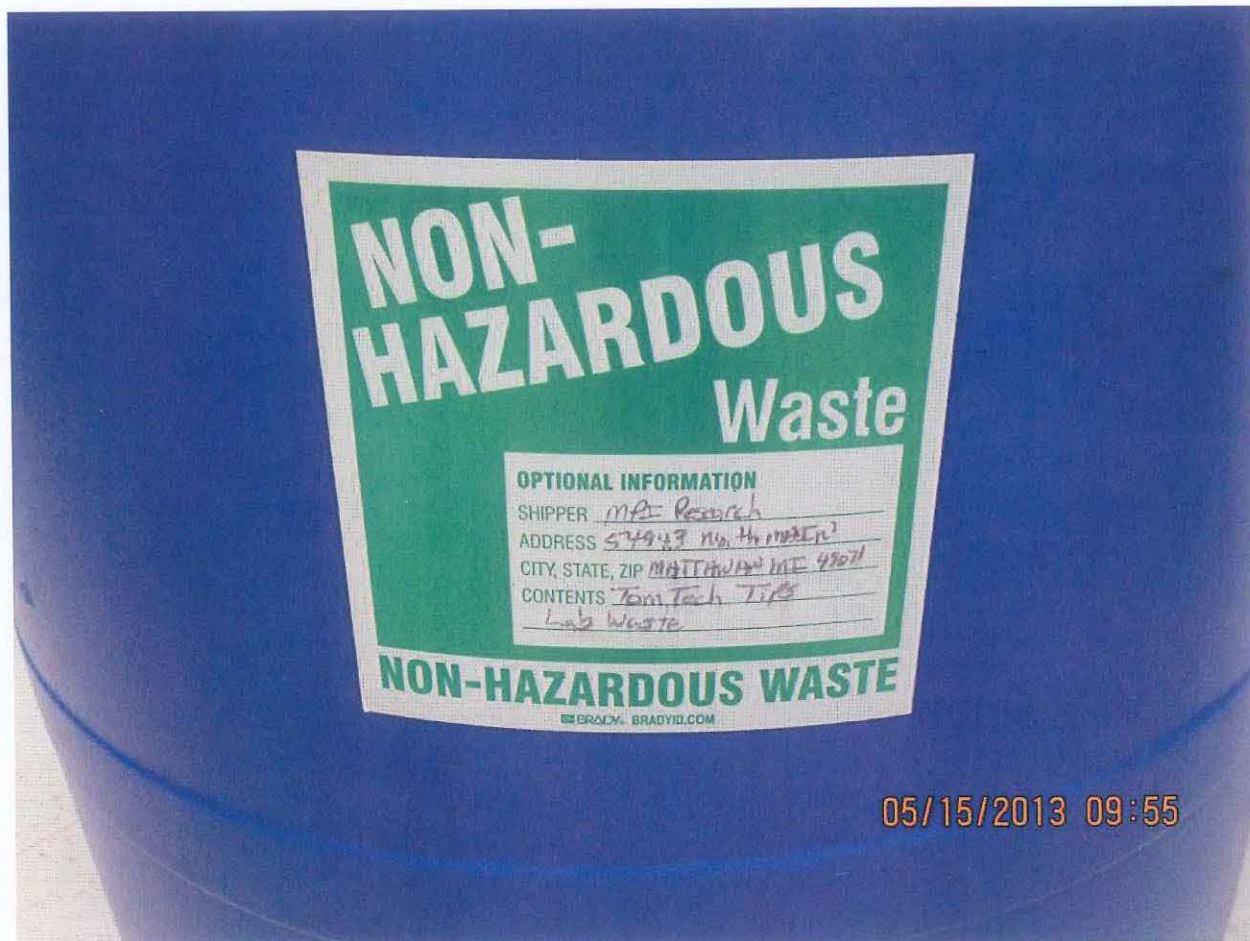
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Bio-Analytical Area

Description: A 55-gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Laboratory Waste.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #11

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Bio-Analytical Area

Description: A closer picture of the label of the 55-gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Lab Waste.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #12

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Bio-Analytical Area

Description: A picture of the contents of 55-gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #13

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2514 of the Test Material Control Area (TMC)

Description: A container was observed marked as hazardous waste with D001 waste code.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #14

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2514 of the Test Material Control Area (TMC)

Description: A closer picture of the 5 gallon container observed marked as hazardous waste with D001 waste code.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
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Photograph: #15

Name of Photographer: Cindy Dabner

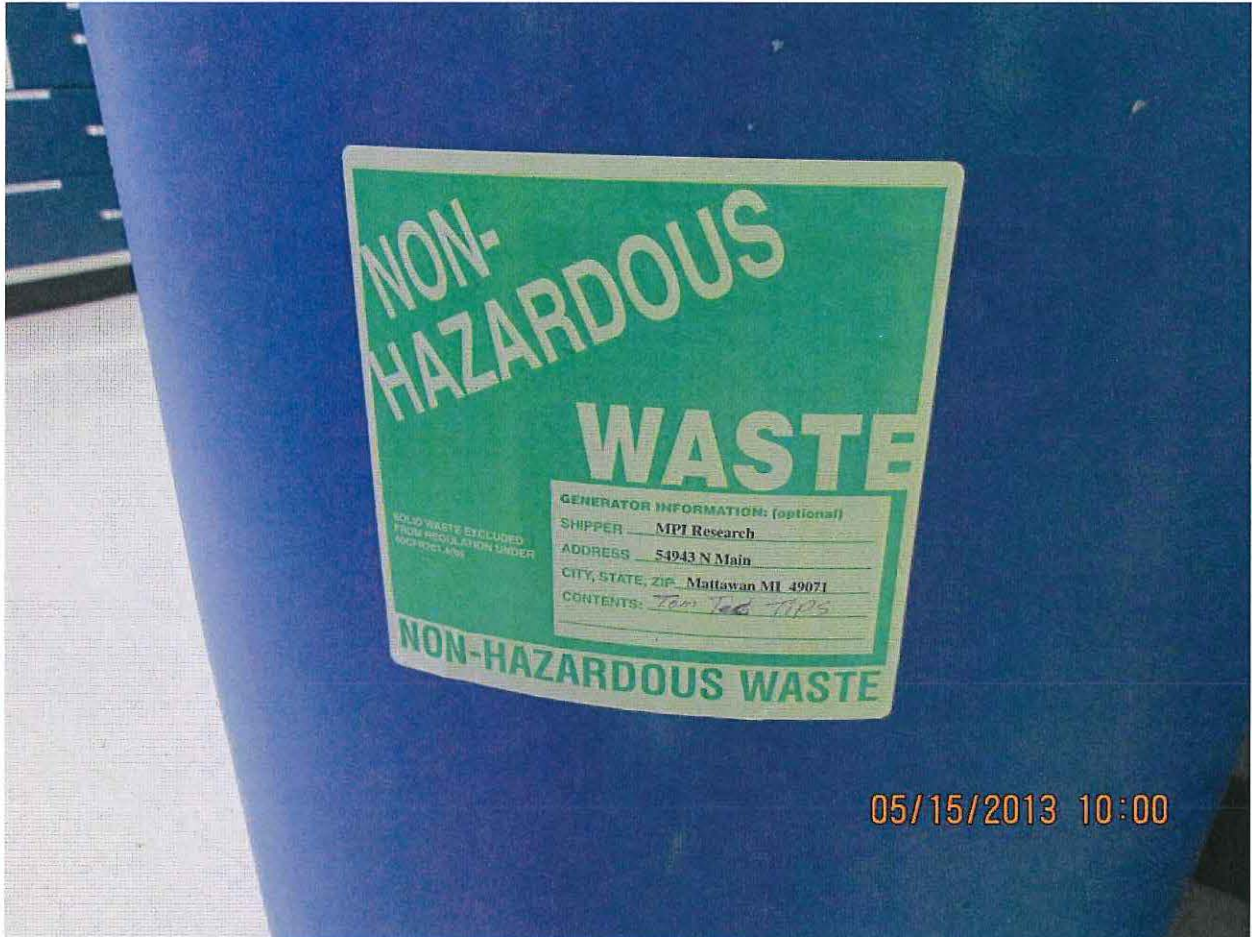
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the Test Material Control (TMC) Area

Description: Non-hazardous waste with contents marked as TOMTEC Tips Trays.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #16

Name of Photographer: Cindy Dabner

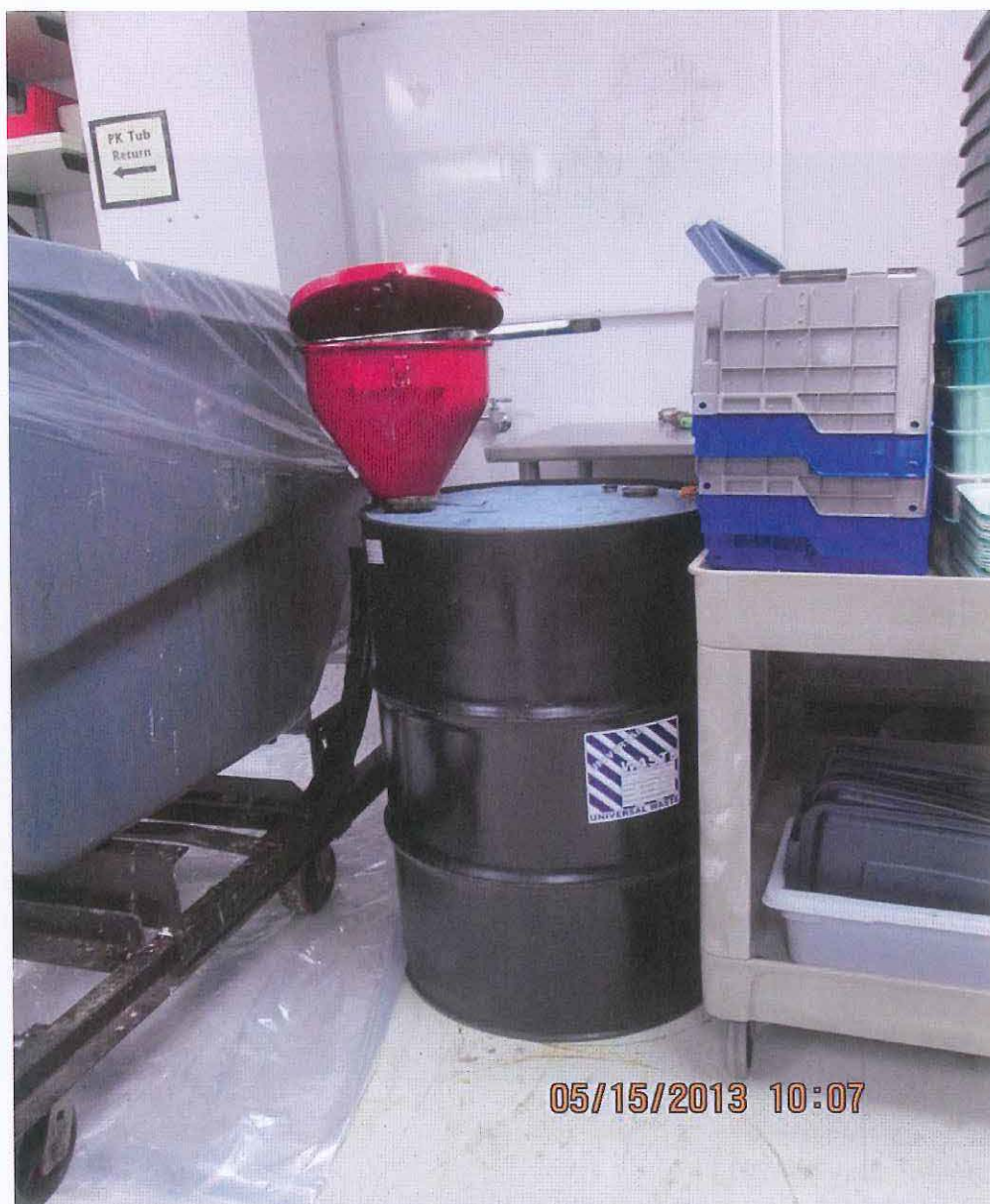
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the Test Material Control Area (TMC)

Description: A closer picture of the label of the 55-gallon drum marked as Non-hazardous waste with contents marked as TOMTEC Tips Trays.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #17

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the Test Material Control Area (TMC)

Description: Open 55-gallon drum marked as universal pharmaceutical liquid

Attachment A
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Photograph: #18

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the Test Material Control Area (TMC)

Description: A closer picture of the Open 55-gallon drum marked universal pharmaceutical liquid

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #19

Name of Photographer: Cindy Dabner

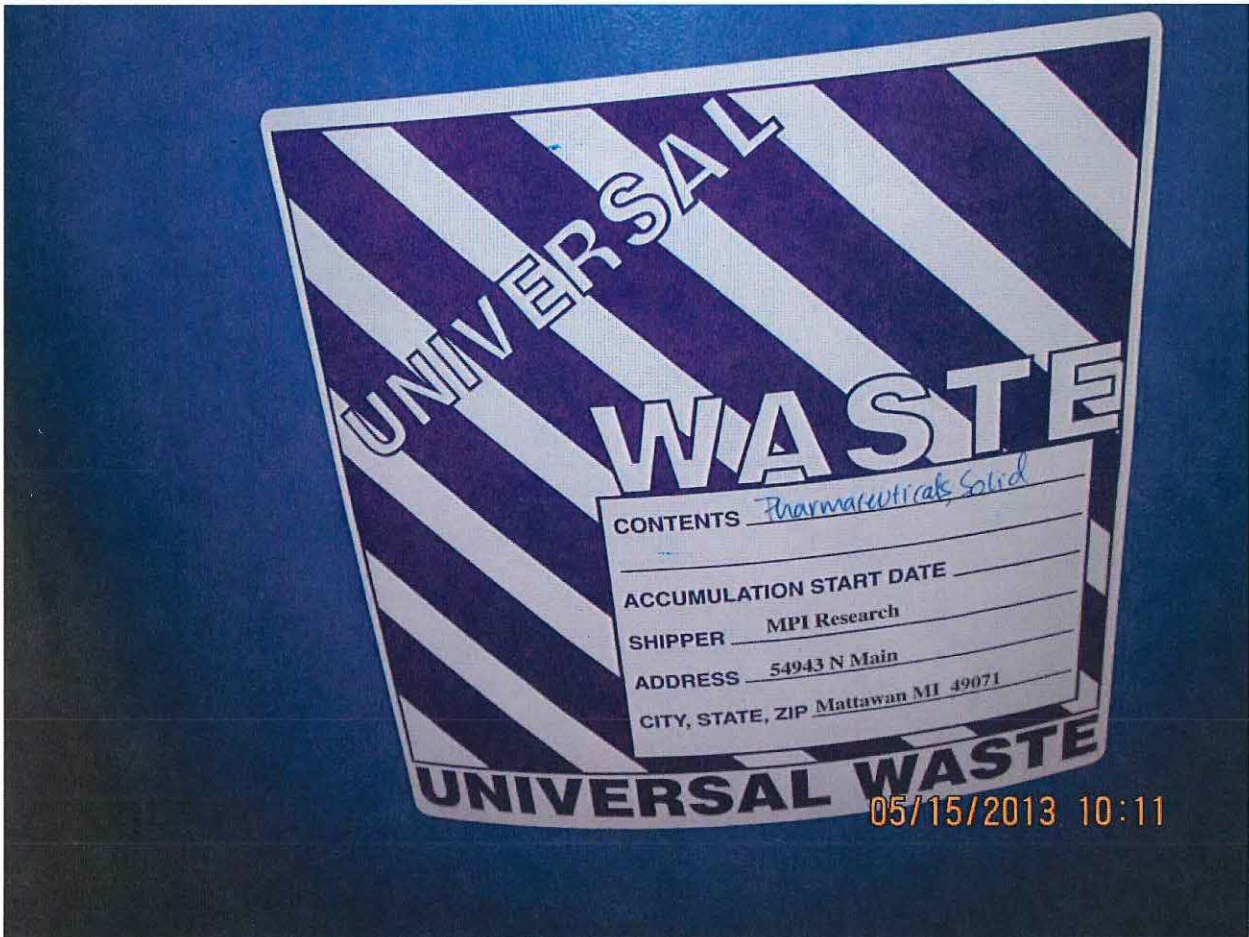
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the TMC

Description: Two 55-gallon drums marked as universal pharmaceutical solids were observed closed and not marked with the accumulation start date.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #20

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467 of the TMC

Description: A closer picture of a 55-gallon drum marked as universal pharmaceutical solid was observed closed without an accumulation start date.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #21

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2514

Description: Two 5-gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #22

Name of Photographer: Cindy Dabner

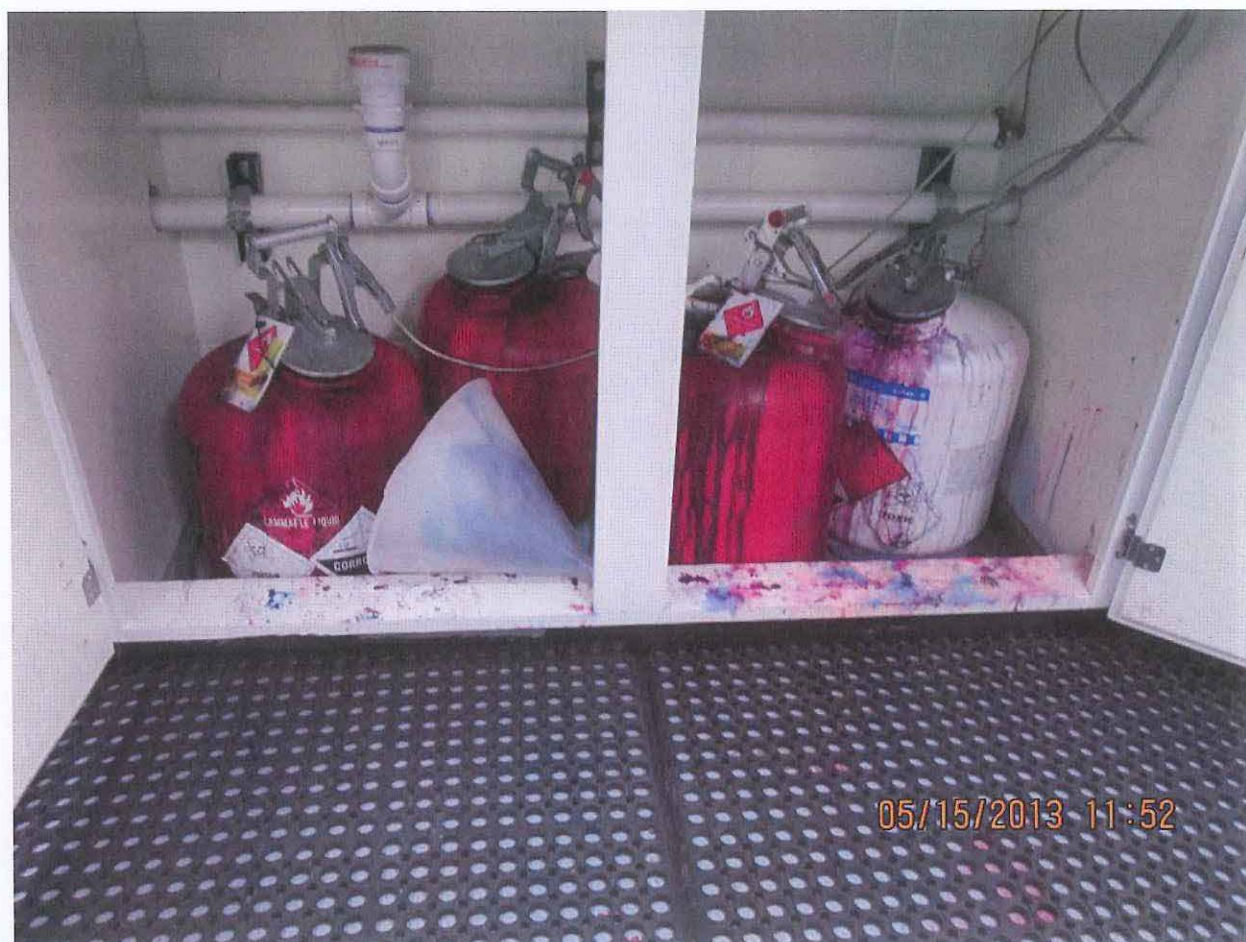
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Room M-2467

Description: Two 5-gallon containers labeled as hazardous waste and marked with hazardous waste codes at the time of the inspection.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #23

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Plastics Room F31

Description: Four 5-gallon containers were observed marked as hazardous waste and labeled with D001 hazardous waste codes, but not kept in good condition.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #24

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Plastics Room F31

Description: A closer picture of the 5-gallon container shown in photograph #23

Attachment A
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Photograph: #25

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: A picture of the Drum Room

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #26

Name of Photographer: Inspector Cindy Dabner

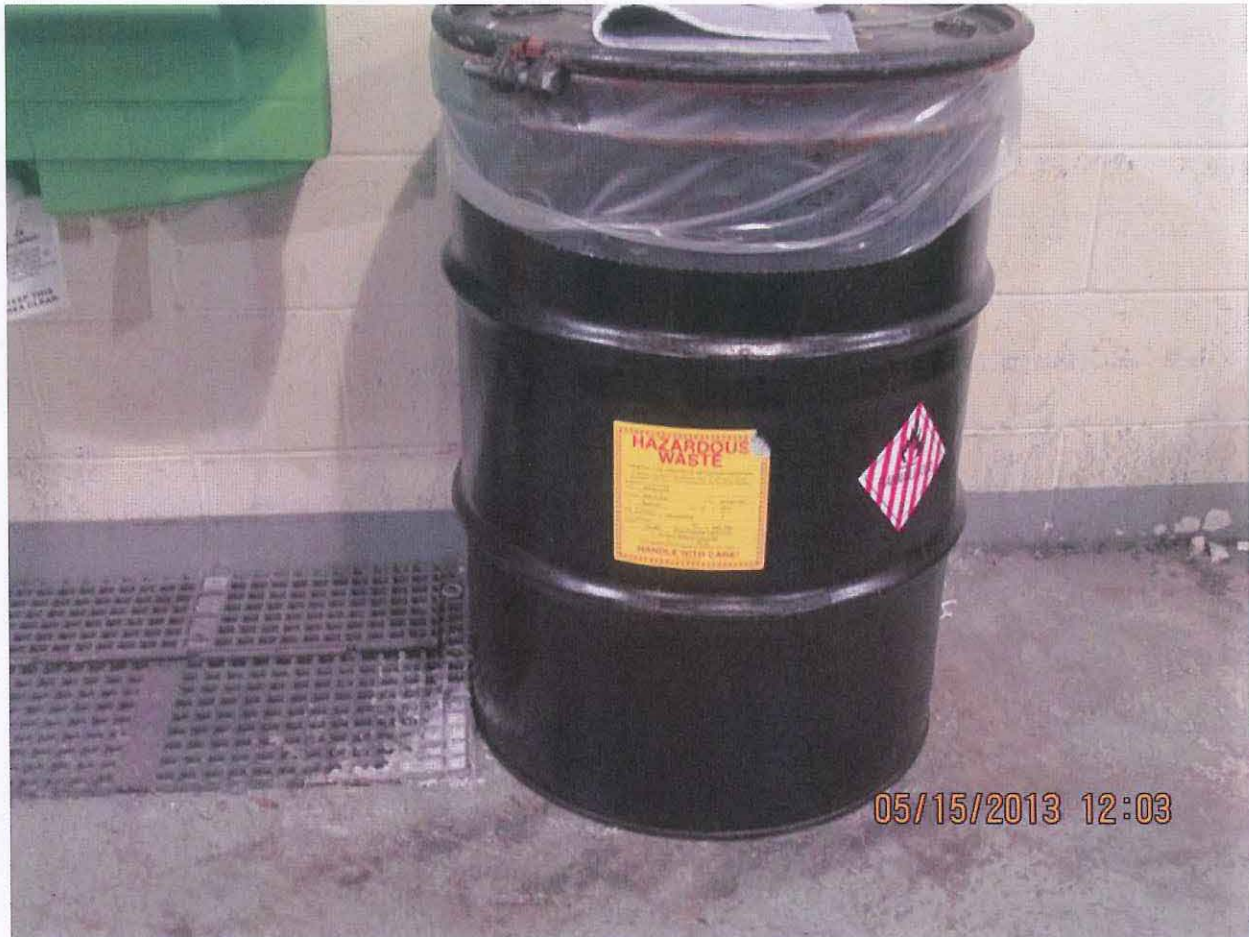
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: Chemical product stored in the Drum Room

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #27

Name of Photographer: Cindy Dabner

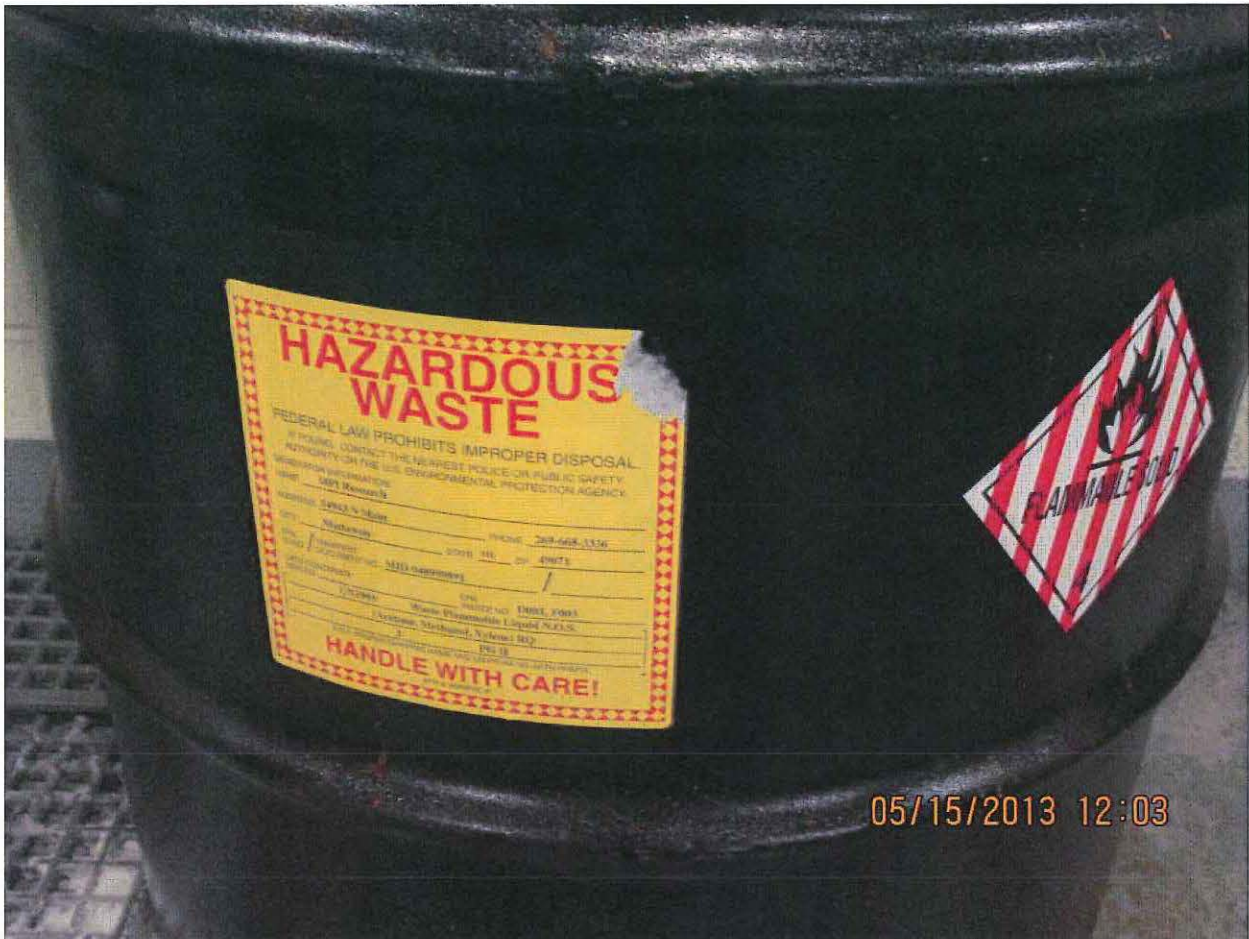
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation Area of the Drum Room

Description: A 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous waste codes D001 and F003.

Attachment A
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Photograph: #28

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation Area of the Drum Room

Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous waste codes D001 and F003.

Attachment A
Photographs for MPI RCRA CEI
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HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:
NAME MPI Research
ADDRESS 54943 N Main PHONE 269-668-3336
CITY Mattawan STATE MI ZIP 49071
EPA ID NO / MANIFEST DOCUMENT NO. MID 048989891
DATE CONTAINER SEALED _____
UN1993 EPA WASTE NO. D001, F003
Waste Flammable Liquid N.O.S.
(Acetone, Methanol, Xylene) RQ
3 PG II
DOT PROPER SHIPPING NAME AND UNPR MA NO WITH PREFIX
HANDLE WITH CARE!
STYLE WMSPEC-P

05/15/2013 12:04

Photograph: #29

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation Area of the Drum Room

Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

Attachment A
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Photograph: #30

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation Area of the Drum Room

Description: A picture of the 55 gallon drum was observed in photographs #27, #28, and #29.

The drum was marked as hazardous waste (acetone, methanol, and xylene) and hazardous waste codes D001 and F003.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #31

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Satellite Accumulation of the Drum Room

Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #32

Name of Photographer: Cindy Dabner

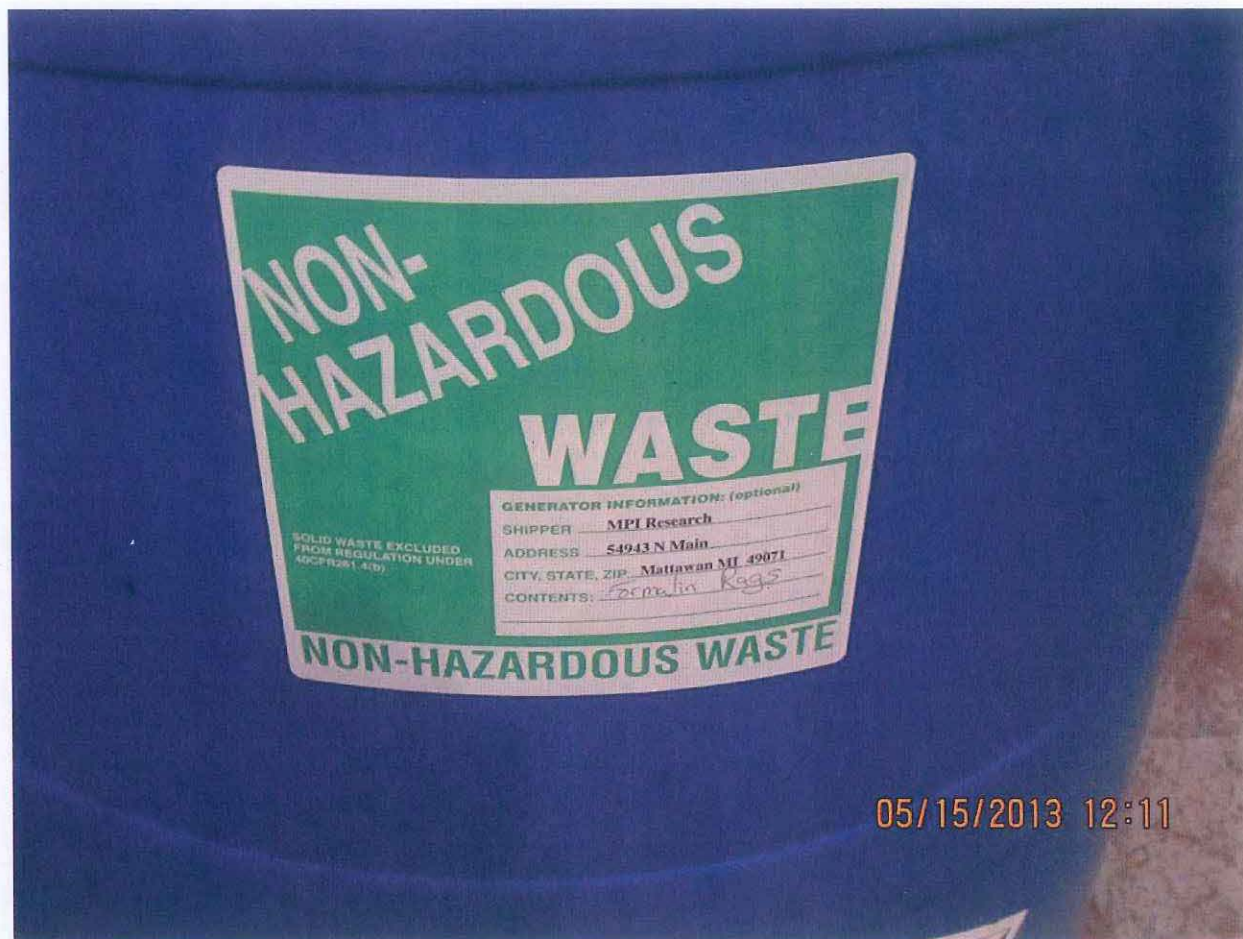
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: A 55 gallon drum was marked as non-hazardous waste containing formalin rags.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #33

Name of Photographer: Cindy Dabner

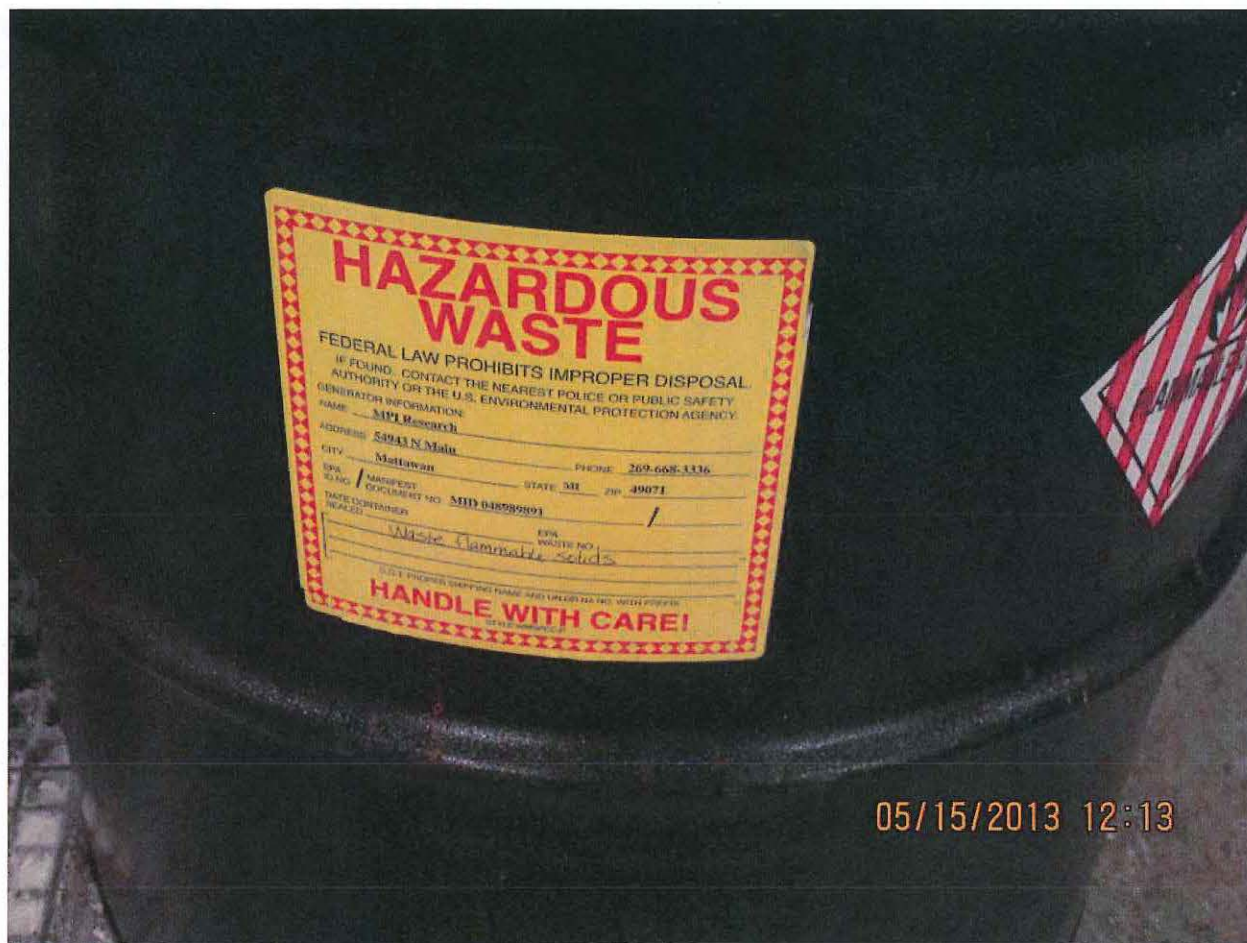
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: A closer picture of the non-hazardous waste label found in photograph #32

Attachment A
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Photograph: #34

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: A 55 gallon drum marked as hazardous waste flammable solids without accumulation start date.

Attachment A
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Photograph: #35

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Drum Room

Description: Top view of 55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid.

Attachment A
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Photograph: #36

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Drum Room

Description: 55 gallon drum located in the Drum Room was observed labeled as a xylene/paraffin waste and a flammable solid.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #37

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Drum Room

Description: Hazardous waste label added to the 55 gallon drum in photograph #36 during the inspection.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
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HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:
NAME **MPI Research** PHONE **269-668-3336**
54943 N Main CITY **Mattawan** STATE **MI** ZIP **49071**
EPA ID NO. / MANIFEST DOCUMENT NO. **MID 048989891**
DATE CONTAINER SEALED EPA WASTE NO. **D001, F003**
UN3175 Waste Solid Containing Flammable Liquid N.O.S. (Xylene) RQ
4 PG II
D.O.T. PROPER SHIPPING NAME AND UN PR MA NO WITH PREFIX
HANDLE WITH CARE!
STYLE WMSPEC-P

05/15/2013 12:19

Photograph: #38

Name of Photographer: Cindy Dabner

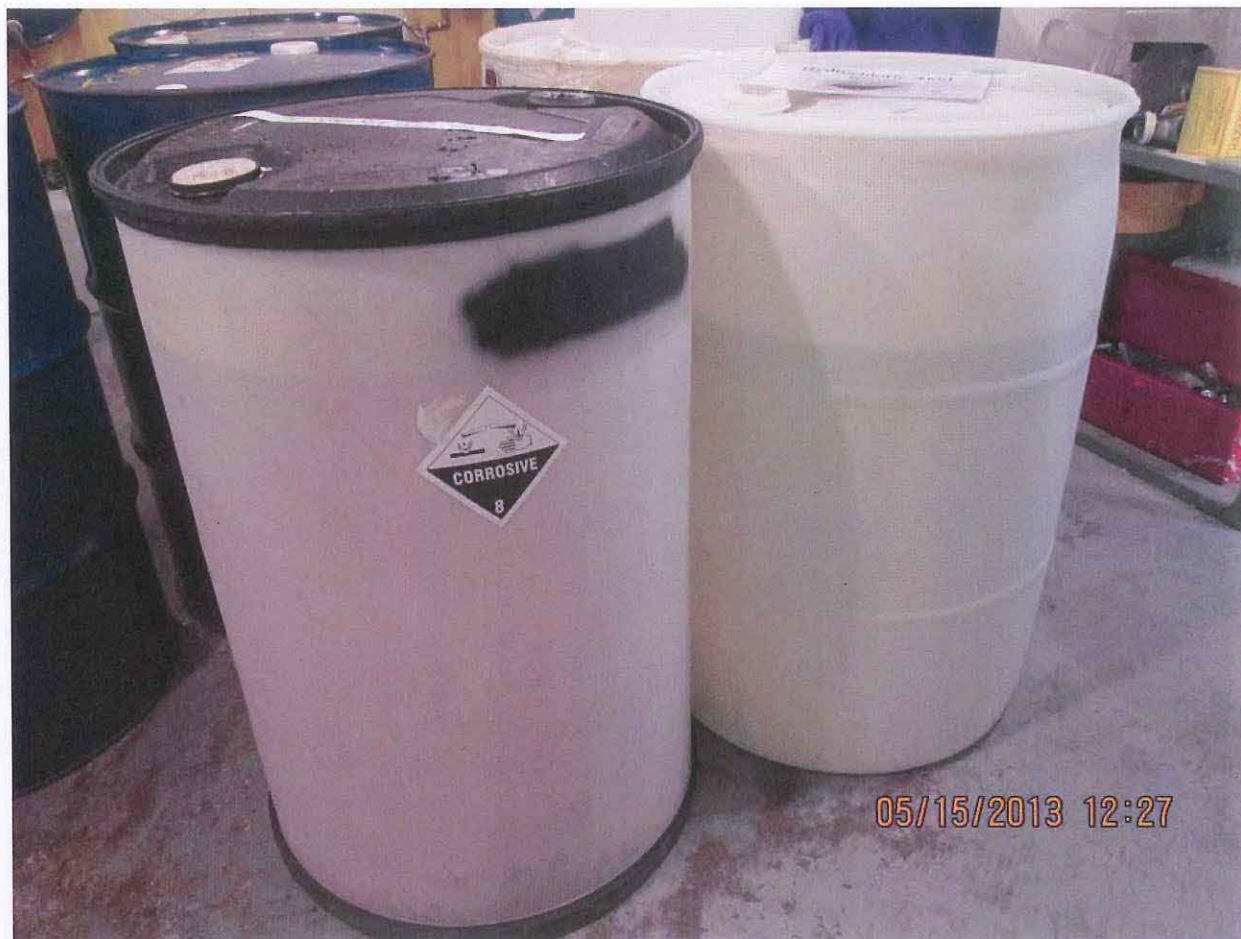
Date/Time of Photograph: May15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Drum Room

Description: A closer picture of the hazardous waste label added to the 55 gallon drum in photograph#37 during the inspection.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #39

Name of Photographer: Cindy Dabner

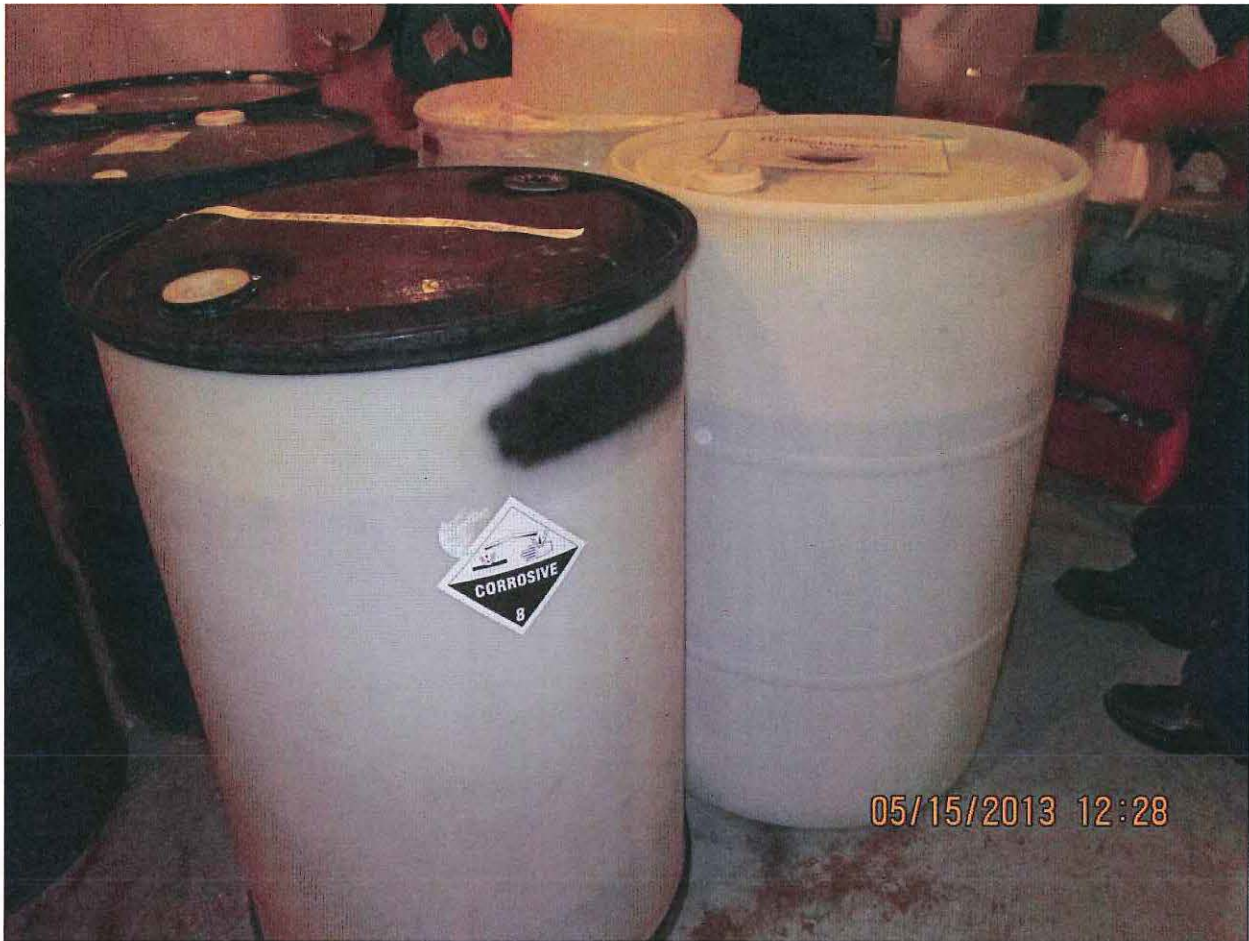
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Two 55 gallon drum observed not marked as hazardous waste with the hazardous waste codes.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #40

Name of Photographer: Cindy Dabner

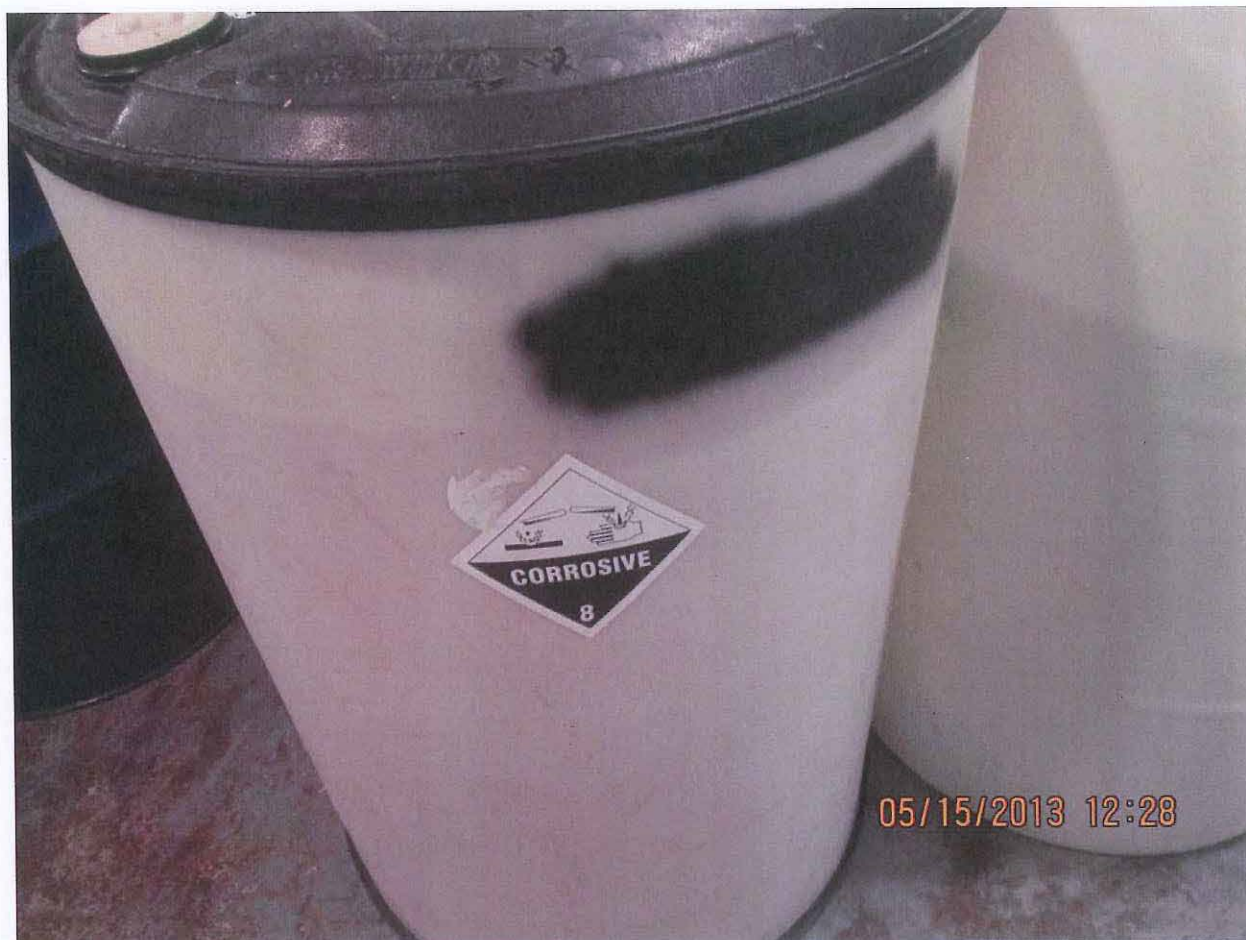
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #41

Name of Photographer: Cindy Dabner

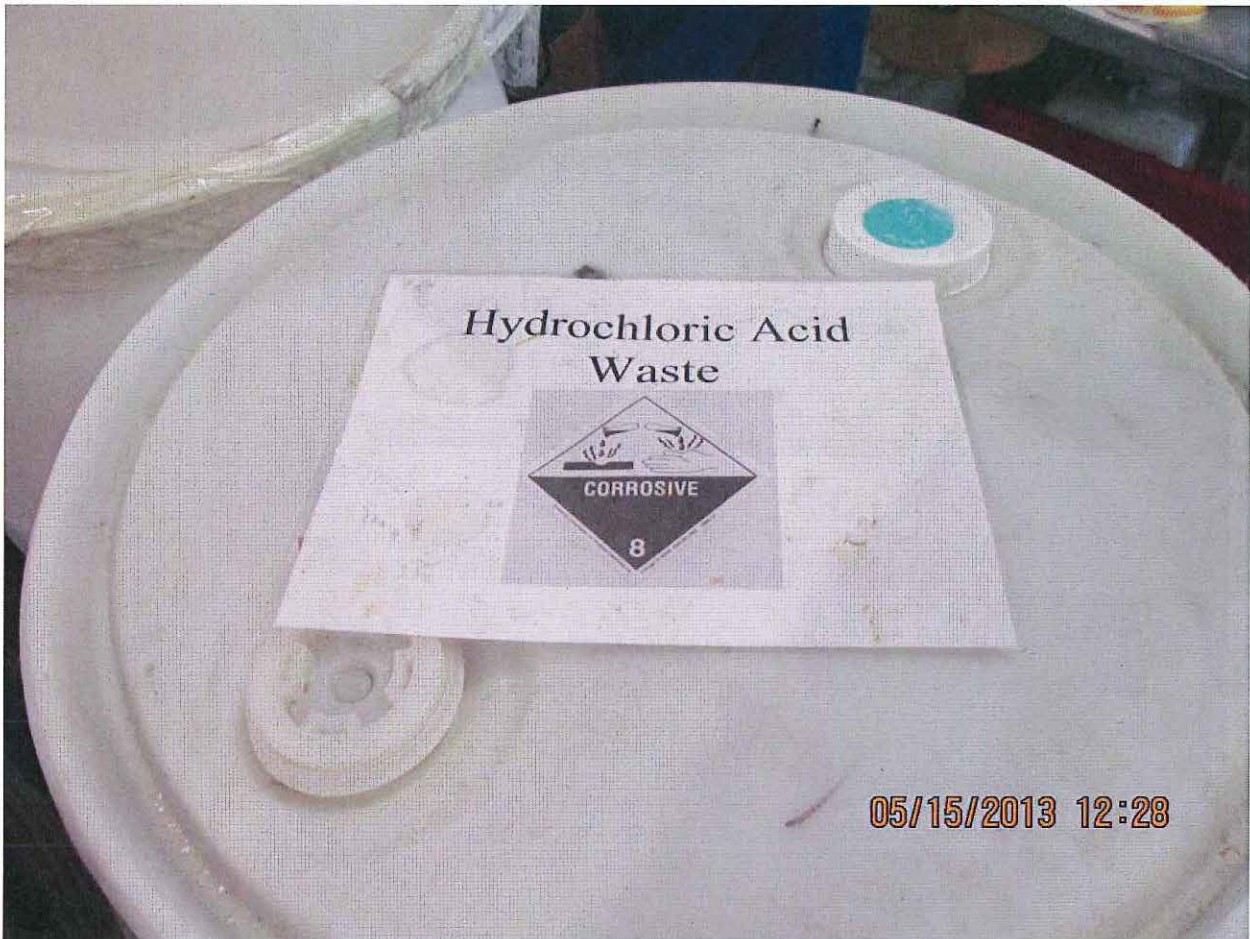
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #42

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Top view of one drum shown in photograph #41

[illegible]

Description: Drum identified in photo#198 labeled as a waste hydrochloric acid without hazardous waste codes was placed on during the inspection.

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:
NAME MPI Research
ADDRESS 54943 N Main PHONE 269-668-3336
CITY Mattawan STATE MI ZIP 49071
EPA ID NO. / MANIFEST DOCUMENT NO. MID 048989891 /
DATE CONTAINER SEALED 5/15/13 EPA WASTE NO. Waste Hydrochloric Acid
3 R6D
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE!
STYLE WMPREC-2

05/15/2013 12:34

Photograph: #44

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Drum Room

Description: Container marked with accumulation start date

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #45

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #46

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #47

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #48

Name of Photographer: Cindy Dabner

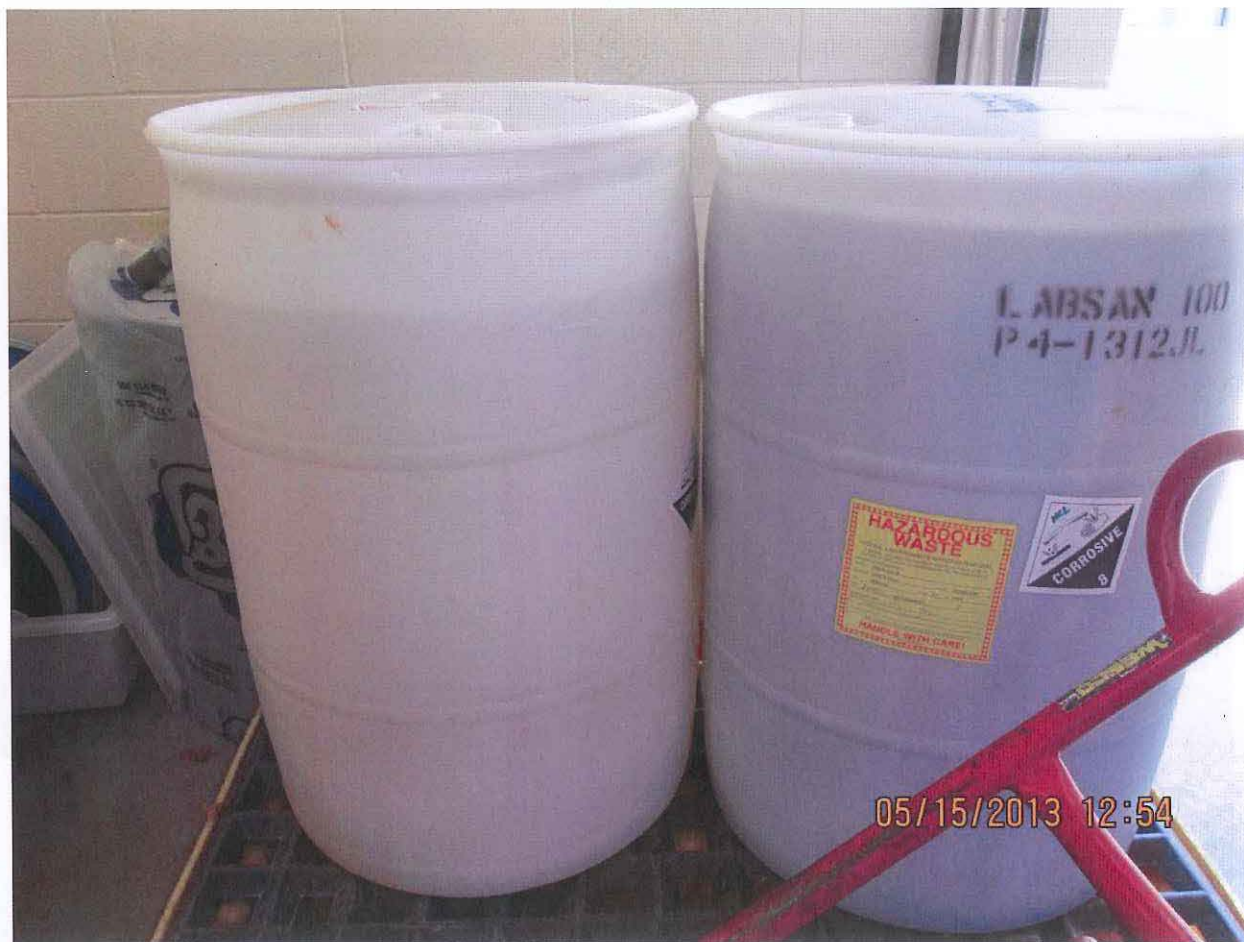
Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: SAA of the Hazardous Waste Building

Description: Container marked and labeled with the item of waste (acetone, xylene, methanol)

Attachment A
Photographs for MPI RCRA CEI
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Photograph: #49

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Container not marked and labeled with contents of waste (hydrochloric acid)

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #50

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building

Description: Container marked and labeled at the time of the inspection

Attachment A
Photographs for MPI RCRA CEI
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May 15, 2013



Photograph: #51

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Hazardous Waste Building

Description: Container not marked and labeled as universal waste lamps

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #52

Name of Photographer: Cindy Dabner

Date/Time of Photograph: May 15, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Hazardous Waste Building

Description: Universal waste marked and labeled at time of inspection

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #53

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: Picture of emergency equipment

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #54

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 54943 North Main Street, Mattawan, MI 49071

Photograph Location: Drum Room

Description: Picture of emergency response

ATTACHMENT B

MPI Photograph Log

MID 048 989 891

Attachment B- MPI Research MID 048 989 891 Photograph Log**Photographer:** US EPA Inspector Cindy Dabner**Location:** 54943 North Main Street, Mattawan, MI 49071**Date(s):** May 15, 2013

Photo #	Description	Date
1	Photograph of the facility sign	May 15, 2013
2	A 55 gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area	May 15, 2013
3	A closer picture of the label of the 55 gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area	May 15, 2013
4	A picture of the room M-2116 sign where hazardous waste is stored in 5 gallon containers	May 15, 2013
5	A picture of the hazardous waste contained in containers ranging in various sizes in Room M-2116	May 15, 2013
6	A tray located on the floor of the Analytical Area holding 5 gallon containers labeled as "mixed organic waste."	May 15, 2013
7	A 55 gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.	May 15, 2013
8	A closer picture of the label on the 55 gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.	May 15, 2013
9	Description: A picture of the test article trays contained in photograph	May 15, 2013
10	A 55 gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.	May 15, 2013
11	A closer picture of the label of the 55 gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Lab Waste.	May 15, 2013
12	A picture of the contents of 55 gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.	May 15, 2013
13	A container was observed in room M-2514 marked as hazardous waste with D001 waste code	May 15, 2013
14	A closer picture of the 5 gallon container observed in room M-2514 marked as hazardous waste with D001 waste code.	May 15, 2013
15	Non-hazardous waste with contents marked as TOMTEC Tips in room M2467	May 15, 2013
16	A closer picture of the label of the 55 gallon drum marked as Non-hazardous waste with contents marked as TOMTEC Tips room M-2467	May 15, 2013

Photo #	Description	Date
17	Open 55 gallon drum marked universal pharmaceutical liquid in room M-2467	May 15, 2013
18	A closer picture of the Open 55 gallon drum marked universal pharmaceutical liquid	May 15, 2013
19	Two 55 gallon drums marked as universal pharmaceutical solids were observed closed in room M-2467	May 15, 2013
20	A closer picture of a 55 gallon drum marked as universal pharmaceutical solid was observed closed in room M-2467 of TMC	May 15, 2013
21	Two 5 gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes in room M-2514	May 15, 2013
22	Two 5 gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes in room M-2467	May 15, 2013
23	Four 5 gallon containers were observed marked as hazardous waste and labeled with D001 hazardous waste codes Plastics Rm F31	May 15, 2013
24	A closer picture of the 5 gallon container shown in photograph#23	May 15, 2013
25	A picture of the Drum Room	May 15, 2013
26	Chemical product stored in the Drum Room	May 15, 2013
27	A 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 in the Drum Room	May 15, 2013
28	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.	May 15, 2013
29	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 of the SSA of the Drum Room	May 15, 2013
30	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003	May 15, 2013
31	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 in the Drum Room	May 15, 2013
32	A 55 gallon drum was marked as non-hazardous waste containing formalin rags	May 15, 2013
33	A closer picture of the non-hazardous waste label taken in photograph #32	
34	A 55 gallon drum marked as hazardous waste flammable solids without accumulation start date	May 15, 2013
35	Top view of 55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid	May 15, 2013
36	55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid.	May 15, 2013
37	Hazardous waste label added to the 55 gallon drum in photo#193	May 15, 2013

Photo #	Description	Date
	during the inspection.	
38	A closer picture of the hazardous waste label added to the 55 gallon drum in photo#193 during the inspection.	May 15, 2013
39	Two 55 gallon drum observed not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
40	Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
41	Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
42	Top view of one drum shown in photo# 197	May 15, 2013
43	Drum identified in photo#198 labeled as a waste hydrochloric acid without hazardous waste codes was placed on during the inspection.	May 15, 2013
44	Container marked with accumulation start date	May 15, 2013
45	Hazardous Waste Storage Area	May 15, 2013
46	Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area	May 15, 2013
47	Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area	May 15, 2013
48	Container marked and labeled with the item of waste (acetone, xylene, methanol)	May 15, 2013
49	Container not marked and labeled with contents of waste (hydrochloric acid)	May 15, 2013
50	Container marked and labeled at the time of the inspection	May 15, 2013
51	Container not marked and labeled as universal waste lamps	May 15, 2013
52	Universal waste marked and labeled at time of inspection	May 15, 2013
53	Picture of emergency equipment	May 15, 2013
54	Picture of emergency response kit	May 15, 2013

ATTACHMENT C

DMEQ Fully Regulated Generator Inspection Checklist

MPI MID 048 989 891

**Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM**

Facility's Name MPI Research Part 3 Rules

Date May 15, 2013 ID# MID 048 989 891 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Hydrochloric Acid D002	Production Process Waste	
Spent Lab Solvents P003 D001	Laboratory Waste	
Formaldehyde D001, D002	Laboratory Waste	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

(NI = Not inspected; N/A = Not applicable)

		YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	<input type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	<input type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306(1)(d): 40 CFR 268.7(a)(5))	262C	<input type="checkbox"/>	NI N/A
IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)			
3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	<input type="checkbox"/>	NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	<input type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:			
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)).	262B	<input type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(ii)).	262B	<input type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(iii)).	262B	<input type="checkbox"/>	NI N/A
d) name, address & ID # of TSD. (Rule 304(1)(b): 40 CFR 262.20(a)(iv)).	262B	<input type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(v)).	262B	<input type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(vi)).	262B	<input type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(vii)).	262B	<input type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(viii)).	262B	<input type="checkbox"/>	NI N/A
7. NOT APPLICABLE			
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3 rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	<input type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	<input checked="" type="checkbox"/>	NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(1)(a): 40 CFR 262.20)	262B	<input type="checkbox"/>	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42(a)).			
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:			
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:			
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input type="checkbox"/>	NI N/A
13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input type="checkbox"/>	NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

		YES	NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))			
a) all listed waste	268A	<input checked="" type="checkbox"/>	NI N/A
b) all characteristic wastes?	268A	<input checked="" type="checkbox"/>	NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	<input type="checkbox"/>	NI N/A
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OR

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	<input type="checkbox"/>	NI N/A
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OR

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	<input type="checkbox"/>	NI N/A
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OR

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	<input type="checkbox"/>	NI N/A
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19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)			
--	--	--	--

a) EPA hazardous waste #?	268A	<input type="checkbox"/>	NI N/A
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b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	<input type="checkbox"/>	NI N/A
--	------	--------------------------	--------

c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	<input type="checkbox"/>	NI N/A
--	------	--------------------------	--------

d) manifest number associated with the shipment?	268A	<input type="checkbox"/>	NI N/A
--	------	--------------------------	--------

e) waste analysis data, where available?	268A	<input type="checkbox"/>	NI N/A
--	------	--------------------------	--------

f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	<input type="checkbox"/>	NI N/A
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UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	<input type="checkbox"/>	NI N/A
--	------	--------------------------	--------

h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	<input type="checkbox"/>	NI N/A
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20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)			
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a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	<input type="checkbox"/>	NI N/A
--	------	--------------------------	--------

b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	<input type="checkbox"/>	NI N/A
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NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	268A	<input checked="" type="checkbox"/>	NI N/A
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22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	<input type="checkbox"/>	NI N/A
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23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	268A	<input checked="" type="checkbox"/>	NI N/A
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NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	<input checked="" type="checkbox"/>	NI N/A
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TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	<input type="checkbox"/>	NI N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	<input checked="" type="checkbox"/>	NI N/A
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27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	<input checked="" type="checkbox"/>	NI N/A
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PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

		YES	NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30))	262C	co.said_obsrld	NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR 172 concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said_obsrld	NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said_obsrld	NI N/A
31. If required (>1000 #s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	co.said_obsrld	NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)			
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	<input checked="" type="checkbox"/>	NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	<input checked="" type="checkbox"/>	NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	<input checked="" type="checkbox"/>	NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	262C	<input checked="" type="checkbox"/>	NI N/A

OR

e) one of the following apply:			
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	<input checked="" type="checkbox"/>	NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7): 40 CFR 262.34(g))	262C	<input checked="" type="checkbox"/>	NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8): 40 CFR 262.34(h))	262C	<input checked="" type="checkbox"/>	NI N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10): 40 CFR 262.34(i))	262C	<input checked="" type="checkbox"/>	NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	<input checked="" type="checkbox"/>	NI N/A
g) are containers compatible with waste in them (265.172)	262C	<input checked="" type="checkbox"/>	NI N/A
h) are containers stored closed? (265.173(a))	262C	<input checked="" type="checkbox"/>	NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	<input checked="" type="checkbox"/>	NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	<input checked="" type="checkbox"/>	NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	<input checked="" type="checkbox"/>	NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/>	NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/>	NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	<input checked="" type="checkbox"/>	NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	<input checked="" type="checkbox"/>	NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	<input checked="" type="checkbox"/>	NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:			
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/>	NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/>	NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	<input checked="" type="checkbox"/>	NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	<input checked="" type="checkbox"/>	NI N/A
e) are container(s) in good condition? (265.171)	262C	<input checked="" type="checkbox"/>	NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	<input checked="" type="checkbox"/>	NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	<input checked="" type="checkbox"/>	NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:			
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	<input checked="" type="checkbox"/>	NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include			
a) impervious base free of cracks? (264.175(b)(1)) :	262C	<input checked="" type="checkbox"/>	NI N/A

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	<input type="checkbox"/>	NI	N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	<input type="checkbox"/>	NI	N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	<input type="checkbox"/>	NI	N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	262C	<input type="checkbox"/>	NI	N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	<input type="checkbox"/>	NI	N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>Explain any yes answer.</i>			NI	N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	<input type="checkbox"/>	NI	N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	<input type="checkbox"/>	NI	N/A
40. Is hazardous waste accumulated in tanks? <i>If so, complete Tank System inspection form.</i>			NI	N/A
41. Is hazardous waste placed on drip pads? <i>If so, complete Wood Preserving inspection form</i>			NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	262C	<input checked="" type="checkbox"/>	NI	N/A
43. Do personnel training records contain the following:				
a) job title? (265.16(d)(1))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) job descriptions? (265.16(d)(2))	262C	<input checked="" type="checkbox"/>	NI	N/A
c) name of employee filling each job? (265.16(d)(1))	262C	<input checked="" type="checkbox"/>	NI	N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	<input checked="" type="checkbox"/>	NI	N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))	262C	<input checked="" type="checkbox"/>	NI	N/A
f) records of training? (265.16(d)(4))	262C	<input checked="" type="checkbox"/>	NI	N/A
g) do new personnel receive required training within 6 months? (265.16(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	<input checked="" type="checkbox"/>	NI	N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	<input checked="" type="checkbox"/>	NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	<input checked="" type="checkbox"/>	NI	N/A
45. If required, does this facility have the following:				
a) internal communications or alarm systems? (265.32(a))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	<input checked="" type="checkbox"/>	NI	N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	<input checked="" type="checkbox"/>	NI	N/A
46. Testing and Maintenance of Emergency Equipment				
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	<input checked="" type="checkbox"/>	NI	N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable only if required (40 CFR 265.32)				
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	<input type="checkbox"/>	NI	N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	<input type="checkbox"/>	NI	N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	<input checked="" type="checkbox"/>	NI	N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	<input checked="" type="checkbox"/>	NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
49. Does the contingency plan contain the following:				
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	<input checked="" type="checkbox"/>	NI	N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	<input checked="" type="checkbox"/>	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	<input checked="" type="checkbox"/>	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	<input checked="" type="checkbox"/>	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	262C	<input checked="" type="checkbox"/>	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	<input checked="" type="checkbox"/>	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	<input checked="" type="checkbox"/>	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	<input checked="" type="checkbox"/>	NI N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	<input checked="" type="checkbox"/>	NI N/A
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	<input checked="" type="checkbox"/>	NI N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	<input checked="" type="checkbox"/>	NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		<input checked="" type="checkbox"/>	NI N/A
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	<input checked="" type="checkbox"/>	NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	<input checked="" type="checkbox"/>	NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	<input checked="" type="checkbox"/>	NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	<input checked="" type="checkbox"/>	NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	<input checked="" type="checkbox"/>	NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114
ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	<input checked="" type="checkbox"/>	NI N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	<input checked="" type="checkbox"/>	NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	<input checked="" type="checkbox"/>	NI N/A

COMMENTS:

ATTACHMENT D

MDEQ Universal Waste Small Quantity Handler (SQH)
Inspection Checklist

MID 048 989 891

ATTACHMENT E

MPI Supporting Documentation Log

MID 048 989 891

Attachment E- MPI Inspection Documentation Log MID 048989891

Inspection Date: May 15, 2013

Generator Waste Profile Batteries Universal Waste
Land Disposal Restriction for F003 Acetone, Ethyl Acetate, Methanol and D001 Ignitable 005463987FLE
July 2007 MDEQ Subject: MPI Letter of Warning
May 4, 2007 MDEQ Subject: MID048989891
August 21, 2007 MPI Subject: Response to MDEQ Letter of Warning to MPI
Site Identification Verification Form Signed 4/19/2013
Site Identification Verification Form Signed 2/29/2012
Hazardous Waste Manifest#009785543JJK 4/26/2012
Hazardous Waste Manifest#004020555FLE 9/13/2011
Hazardous Waste Manifest#004036116FLE 9/13/2011
Hazardous Waste Manifest#004037131FLE 12/08/2011
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004777046JJK 2/8/11
Hazardous Waste Manifest#004777046JJK 2/14/2011
Hazardous Waste Manifest#003274001JJK 8/24/2011
Hazardous Waste Manifest#003274361JJK 12/14/2011
Fiscal Year 2011 Hazardous Waste User Charge Invoice
Site Identification Verification Form Signed 4/25/2011
Hazardous Waste Manifest#004778189JJK 2/16/2010
Hazardous Waste Manifest#004778402JJK 10/05/2010
Hazardous Waste Manifest#002380589FLE 10/15/2010
Hazardous Waste Manifest#004007115FLE 12/13/2010
Hazardous Waste Manifest#004007115FLE 12/13/2010
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004007115FLE 12/13/10
Hazardous Waste Manifest#003274001JJK 8/24/2011
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004007115FLE 12/13/10
Hazardous Waste Manifest#002380589FLE 10/15/2010
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids, D003, D009, D004, U006, D011 Manifest Document #002380589FLE 10/15/10
DLD Drug and Laboratory Disposal Invoice 11/11/2010

**Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER
(SQH) INSPECTION**

Facility Name MPI Research Part 2 Rules
Date May 15, 2013 I.D. # MID 048 989 891 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

		YES	NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	<input checked="" type="checkbox"/>	NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	<input type="checkbox"/>	NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4))

QTY HANDLED:

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	<input checked="" type="checkbox"/>	NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	<input checked="" type="checkbox"/>	NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.B	<input checked="" type="checkbox"/>	NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	<input checked="" type="checkbox"/>	NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	<input checked="" type="checkbox"/>	NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) requirements)

QTY HANDLED:

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a))	273.B	<input checked="" type="checkbox"/>	NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	<input checked="" type="checkbox"/>	NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	<input checked="" type="checkbox"/>	NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input checked="" type="checkbox"/>	NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input checked="" type="checkbox"/>	NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input checked="" type="checkbox"/>	NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	<input checked="" type="checkbox"/>	NI N/A

CONSUMER ELECTRONICS: (Rule 228(4))

QTY HANDLED:

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	<input checked="" type="checkbox"/>	NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	<input checked="" type="checkbox"/>	NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.B	<input checked="" type="checkbox"/>	NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse (Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii); remove modular components for reuse (Rule 228(4)(g)(iii))	273.B	<input checked="" type="checkbox"/>	NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d))**QTY HANDLED:**

17. Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(i)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4)(c)(ii))	273.B	<input checked="" type="checkbox"/> NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(4)(c)(iv)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii)(B)) <i>Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste</i>	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	<input type="checkbox"/> NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	<input type="checkbox"/> NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14**QTY HANDLED:**

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	<input type="checkbox"/> NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	<input type="checkbox"/> NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)". (Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	<input type="checkbox"/> NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	<input type="checkbox"/> NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	<input type="checkbox"/> NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	<input type="checkbox"/> NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	<input type="checkbox"/> NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(viii))	273.B	<input type="checkbox"/> NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	<input type="checkbox"/> NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i)(A&B), 273.13(c)(4)(i))	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	<input type="checkbox"/> NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	<input type="checkbox"/> NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)**QTY HANDLED:**

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	<input type="checkbox"/> NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	<input type="checkbox"/> NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	<input type="checkbox"/> NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	<input type="checkbox"/> NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) [See 273.14(c) if 273.14(b) not possible]	273.B	<input type="checkbox"/> NI N/A

PHARMACEUTICALS: (Rule 228(4))**QTY HANDLED:**

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	<input type="checkbox"/> NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	<input type="checkbox"/> NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	<input type="checkbox"/> <u>NI</u> N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16) <i>must</i>	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
---	-------	---

RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	<input type="checkbox"/> <u>NI</u> N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	<input checked="" type="checkbox"/> <u>NI</u> N/A
45. If the SQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	<input type="checkbox"/> <u>NI</u> N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	<input type="checkbox"/> <u>NI</u> N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2))	273.B	<input type="checkbox"/> <u>NI</u> N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	<input type="checkbox"/> <u>NI</u> N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a): 40 CFR 273.18(g))	273.B	<input type="checkbox"/> <u>NI</u> N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	<input type="checkbox"/> <u>NI</u> N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	<input type="checkbox"/> <u>NI</u> N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	<input type="checkbox"/> <u>NI</u> N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	<input type="checkbox"/> <u>NI</u> N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	<input type="checkbox"/> <input checked="" type="checkbox"/>	N/N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	<input type="checkbox"/> <input checked="" type="checkbox"/>	N/N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	<input type="checkbox"/> <input type="checkbox"/>	N/N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	<input type="checkbox"/> <input type="checkbox"/>	N/N/A
57. Does transporter comply w/ USDOT requirements for package/labels/markings/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste, (I) or (S), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	<input type="checkbox"/> <input type="checkbox"/>	N/N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	<input type="checkbox"/> <input type="checkbox"/>	N/N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a))	273.D	<input type="checkbox"/> <input type="checkbox"/>	N/N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	<input type="checkbox"/> <input type="checkbox"/>	N/N/A

COMMENTS:

[illegible]

Hazardous Waste Manifest#005463987FLE 03/13/2013
Hazardous Waste Manifest#005463988FLE 03/12/2013
Hazardous Waste Manifest#005463989FLE 03/12/2013
Hazardous Waste Manifest#005467306FLE 03/13/2013
Land Disposal Notification Certification for D001, D002, U188, U123 Manifest Document #005463988FLE 3/13/13
Hazardous Waste Manifest#009465498JJK 11/11/2012
Land Disposal Notification Certification for F003 and D001 Manifest Document #0040446561FLE
Land Disposal Notification Certification for D001, D002, D003, D007, D011, and P105 Manifest Document #004037130FLE 3/5/12
DLD Drug and Laboratory Disposal Invoice 05/09/2012
Hazardous Waste Manifest#004046561FLE 03/05/2012
Hazardous Waste Manifest#004037130FLE no DF signature
Hazardous Waste Manifest#009465498JJK 01/11/2012
DLD Drug and Laboratory Disposal Invoice 11/09/2011
Hazardous Waste Manifest#004020555 09/13/2011
Hazardous Waste Manifest#004036116 09/13/2011
Land Disposal Notification Certification for D001, D002, F003 Manifest Document #004036116FLE 09/13/11
Generator Waste Profile Form Spent Laboratory Solvents (Bulk)
Land Disposal Notification Certification for D001, D002, F003 Manifest Document #004020555FLE 9/13/11

ATTACHMENT F
MPI Post-Inspection Log
MID 048 989 891

Attachment F- MPI Post-Inspection Documentation Log MID048989891**Inspection Date: May 15, 2013**

Description
1# Site Map Facility Relative to Surrounding Area
2# Outdoor Chemical Storage Area Overview
3# Indoor Chemical Storage Area Overview
4# Outdoor Chemical Storage Area Overview
5# Site Plan, Indoor Chemical Storage Pictures
POL-DRP5 PDF Effective 03/01/13
Pollution Incident Prevention Plan 2013 Spill Contingency Plan for MPI Research
POL-SHE-17 MPI Response Emergency Action Plan (EAP)
Waste Handling Training Matrix
Generator Waste Profile Form (Absorbents with Formalin- Debris Rags/Materials containing Formalin)
Generator Waste Profile Form (Formaldehyde D001 and D002)
Generator Waste Profile Form (Hydrochloric Acid D002)
Generator Waste Profile Form (Spent Laboratory Solvents Xylene, Alcohol F003, D001)
Generator Waste Profile Form (Spent Oil for Equipment)
Exylim Weekly Report 2011-2013 Hazardous Waste Building
Exylim Weekly Report 2011-2013 EZA
IMG 163
IMG 174
IMG178
IMG163
Lion RCRA Training 030912
RCRA Waste Management Training Listing
Waste Handling Overview and Safety 042913
Attachment#1 Site Map
Attachment#2 Site Map
Attachment#3 Site Map
Attachment#4 Site Map
Attachment#5 Site Map
POL DPR 6-Corporation Disaster Recovery Hazardous Materials Plan 03-01-13
Pollution Incident Prevention Plan June 2013
POL SHE 17 Emergency Plan
Waste Handler Training Matrix
Waste Profile Absorbent with Formalin
Waste Profile Formaldehyde
Waste Profile Hydrochloric Acid
Waste Profile Lab Waste (alcohol)
Waste Oil
MPI Evaluation Observation
Exylim Evaluation Observation 2011-2013
Supplemental Training Records

Description
Excel RCRA Waste Management Training
Waste Handling Overview
Image Photo#163
Image Photo#174
Image Photo#178
Image Photo#163

A2
OCT 02 1991



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

INTERNATIONAL RESERACH AND DEVELOPMENT CORP
ATTN EXECUTIVE VICE PRESIDENT
500 N MAIN
MATTAWAN. MI 49071

RE: EPA ID #: MID048989891

In response to your request of 8/8/91 the following
information has been updated:

Generator status to LARGE QUANTITY GENERATOR

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon Kiddon".

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028, Expires 10/31/91
GSA No. 0246 EPA 01

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



EPA

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

AUG 27 1991

U.S. EPA REGION V

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

M I D O 4 8 9 8 9 8 9 1

II. Name of Installation (Include company and specific site name)

INTERNATIONAL RESEARCH AND DEVELOPMENT CORPORATION

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

500 NORTH MAIN

Street (continued)

City or Town

MATTAWAN

State

ZIP Code

MI

49071-

County Code

County Name

080 VAN BUREN

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

Job Title

Phone Number (area code and number)

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

Street, P.O. Box, or Route Number

City or Town

State

ZIP Code

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)
Month Day Year

Yes

No

- 2 -

Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

October 2, 1986

Wilson Dean, Emergency Coordinator
International Research & Development Corporation
501 North Main Street
Mattawan, Michigan 49071

Re: EPA ID #MID05Q989891⁴⁸

Dear Mr. Dean:

On September 30, 1986, staff of the Michigan Department of Natural Resources conducted a follow-up inspection of your facility to confirm that the violations of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, identified previously have been corrected. Those corrections were the subject of your letter dated September 26, 1986.

Based on this inspection, we have determined that your facility has returned to compliance with those aspects of RCRA that were evaluated.

If you have any questions, please contact me at (616) 685-9886 for assistance.

Sincerely,

Chuck Bikfalvy
Environmental Quality Analyst
Hazardous Waste Division
Plainwell District

CB:ls

cc: U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number: M I D . 0 5 0 9 8 9 8 9 1

Installation Name: INTERNATIONAL RESEARCH + DEVELOPMENT CORP

Location Address: 501 N. MAIN ST.

City: MATTAWAN State: MI 49071

Date of Inspection: 9/30/86 Time of inspection (from) 4:00 (to) 4:30

Person(s) Interviewed

Title

Telephone

WILSON DEAN

EMERGENCY COORD

(616) 668-3336

Inspector(s)

Agency/Title

Telephone

CHUCK BIKELVY

MNR/EOA

(616) 685-9886

Installation Activity (mark only one box)

Inspection Form(s)

☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

FOLLOW-UP INSPECTION. CO. HAS CORRECTED
THOSE ITEMS FOUND IN VIOLATION 7/18/86.
RETURNED TO COMPLIANCE WITH THOSE
ASPECTS OF RCRA EVALUATED.



International Research and Development Corporation

MATTAWAN, MICHIGAN, U.S.A. 49071 TELEPHONE (616) 668-3336

9/26/86

Mr. Chuck Bikfalvy
Environmental Quality Analyst
Hazardous Waste Division
Plainwell District Headquarters
Michigan Department of
Natural Resources
Box 355
Plainwell, MI 49080

Re: EPA ID #MID050989891

Dear Mr. Bikfalvy:

Please be advised that we are in receipt of your correspondence of September 16, 1986 which included a copy of your letter of July 23, 1986. This letter and attachment was not previously received by the International Research and Development Corporation.

In your July 23, 1986 letter you cited three areas of concern. Please be advised of the following actions which have been taken with regard to the concerns noted:

1. MDNR Observation

"One drum of waste xylene in the storage area was stored for longer than 90 days, having been dated March 25, 1986. This is technically a violation of 40 CFR 262.34, although it could have been managed according to 262.34(c) (1) in a satellite area and dated when full."

IRDC Response

The drum of waste xylene which was observed has been removed from the storage area. Drums which have not been fully filled in the future will be retained in a satellite area until completely filled. Further, weekly inspections of the storage area by the Emergency Coordinator have been initiated and coordination will be initiated to insure a timely removal of filled drums from the IRDC facilities.

XC:EPA

9-29-86

RECEIVED
SEP 29 1986

Mr. Chuck Bikfalvy
Page 2
September 26, 1986

2. MDNR Observation:

"Nine drums of ignitable waste (waste dehydrant) were not clearly marked with the words "hazardous waste" and the date upon which the period of accumulation began. These are violations of 40 CFR 262.34(a) (3) and 40 CFR 262.34 (a) (2), respectively."

IRDC Response:

All drums in the storage area are now properly labelled as "Hazardous waste" and are properly dated. Weekly inspections by the Emergency Coordinator will insure that drums are properly labelled and dated in the future.

3. MDNR Observation:

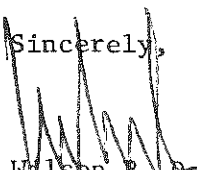
"Personnel training records were technically [sic] deficient, in that they did not include the job titles and job descriptions required by 40 CFR 265.16(d) (1&2)."

IRDC Response:

Personnel training records now include the job title and job description for each individual who is required to handle hazardous waste.

Should you have questions concerning the above or if I may be of further assistance please do not hesitate to contact me.

Sincerely,


Wilson P. Dean, M.S.
Emergency Coordinator

WPD:js

Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

September 16, 1986

CERTIFIED MAIL

Wilson Dean, Emergency Coordinator
International Research and Development Corporation
500 North Main Street
Mattawan, Michigan 49071

Re: EPA ID #MID050989891

Dear Mr. Dean:

Enclosed is a copy of my letter of warning dated July 23, 1986, with its attachment, the RCRA inspection report dated July 18, 1986.

These documents are being mailed again as a result of my telephone call on this date, when you told me you had never received the original mailing.

Since the response due date of August 25, 1986, has passed, please respond in writing by October 1, 1986, addressing all items in the original letter of warning.

In the meantime, please call me at (616) 685-9886 if you have any questions.

Sincerely,

Chuck Bikfalvy
Environmental Quality Analyst
Hazardous Waste Division
Plainwell District

CB:ls

Enclosure

cc: U.S. EPA - Region V

Michigan Department of Natural Resources
Hazardous Waste Management and Remediation
Page 2
July 23, 1986

EPA

For the assistance, please feel free to call me if you have any questions.

Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

July 23, 1986

Wilson Dean, Emergency Coordinator
International Research and Development Corporation
500 North Main Street
Mattawan, Michigan 49071

MID048 989 891

Re: EPA ID #MID050989891

Dear Mr. Dean:

On July 18, 1986, staff of the Michigan Department of Natural Resources, representing the Department and the U.S. Environmental Protection Agency, reinspected your facility for compliance with the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, and Michigan's Hazardous Waste Management Act (P.A. 64, 1979), as amended. The inspection was a follow-up to one conducted on January 28, 1986, and company responses of January 29, March 12, and April 13, 1986.

Based on this inspection and on the letters listed above, we have determined that the following violations remain:

1. One drum of waste xylene in the storage area was stored for longer than 90 days, having been dated March 25, 1986. This is technically a violation of 40 CFR 262.34, although it could have been managed according to 262.34(c)(1) in a satellite area and dated when full.
2. Nine drums of ignitable waste (waste dehydrant) were not clearly marked with the words "hazardous waste" and the date upon which the period of accumulation began. These are violations of 40 CFR 262.34(a)(3) and 40 CFR 262.34(a)(2), respectively.
3. Personnel training records were technically deficient, in that they did not include the job titles and job descriptions required by 40 CFR 265.16(d)(1&2).

Please respond in writing by August 25, 1986, documenting actions taken to correct these remaining violations.

continued...

RCRA Inspection Report

EPA Identification Number: M I D . 0 5 0 9 8 9 8 9 1Installation Name: INTERNATIONAL RESEARCH + DEVELOPMENT CORP.Location Address: 500 N. MAIN ST.City: MATTAWANState: MI 49071Date of Inspection: JULY 18, 86 Time of inspection (from) 3:20 (to) 5:00

Person(s) interviewed

Title

Telephone

WILSON DEANEMERGENCY COORDINATOR (616) 668-3336NEWELL PANGBURNDIR. OF PURCHASING"

Inspector(s)

Agency/Title

Telephone

CHUCK BIKFALVYEMMWR / ECA(616) 685-9886Installation Activity (mark only one box)Inspection Form(s)☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☒ Generation only

B

☐ Transportation only

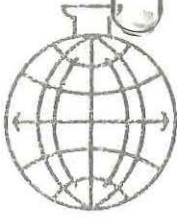
C

FOLLOW-UP INSPECTION

DRUM STORAGE AREA: HAS SECONDARY CONTAINMENT, 5 DRUMS
WASTE XYLENE LABELED + DATED, 1 OVER 90 DAYS (NOT YET FULL),
9 DRUMS WASTE DEHYDRANT (IGNITABLE), WITH NO LABELS OR DATES
6 DRUMS ORGANIC WASTE (IGNITABLE), LABELS + DATES OK, 20
DRUMS TOTAL.

PERSONNEL TRAINING: NO JOB TITLES OR JOB DESCRIPTIONS,
OTHERWISE OK.

MANIFESTS OK. SATELLITE ACCUMULATION OK.



International Research
and Development Corporation

MID 048989891

April 13, 1986

RECEIVED
APR 16 1986

Mr. Chuck Bikfalvy
Environmental Quality Analyst
Department of Natural Resources
Hazardous Waste Division
Plainwell District
Box 355
Plainwell, Michigan 49080

H.W.D. — PLAINWELL

Re: International Research and
Development Corporation Inspection
of January, 28, 1986

Dear Mr. Bikfalvy:

Enclosed please find a draft copy of the contingency plan pursuant to 40 CFR section 265.50. Your comments are welcomed regarding this plan. If you wish to respond to the draft, I would appreciate hearing from you within 30 days. If I do not hear from you, I will presume that the plan is acceptable and will proceed to send copies of the plan to the various officials as per 40 CFR section 253.53.

In order to reinstruct personnel involved in the handling of hazardous waste, IRDC will conduct training sessions using one of its employees, Mr. Wilson Dean. Mr. Dean has a graduate degree in Occupational and Environmental Toxicology. He has also been involved in the development of contingency plans.

The sessions held by Mr. Dean will be documented as they are held. IRDC will begin to schedule the reinstruction of personnel within a few weeks. At present, personnel are familiar with the handling of the small quantities of hazardous waste generated at IRDC.

If you should have any questions or concerns regarding this correspondence, please do not hesitate to contact me directly.

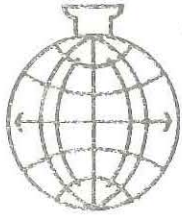
Sincerely,

Francis X. Wazeter, III, JD

FXW:cfs

Enclosures

XC: EPA 4/16/86



International Research
and Development Corporation

March 12, 1986

MD 050 989 891
RECEIVED
MAR 14 1986
HMC - PLAINWELL

Mr. Chuck Bikfalvy
Environmental Quality Analyst
Department of Natural Resources
Hazardous Waste Division
Plainwell District
Box 355
Plainwell, Michigan 49080

Dear Mr. Bikfalvy:

On January 28, 1986, staff of the Department of Natural Resources (DNR) acting as representatives of the United States Environmental Protection Agency, conducted an inspection of the International Research and Development Corporation (IRDC). The inspection revealed observations concerning 40 CFR 262 which reclassified IRDC from a small quantity generator to a large quantity generator. Pursuant to your request in your letter of February 11, 1986, IRDC wishes to make the following response to your observations.

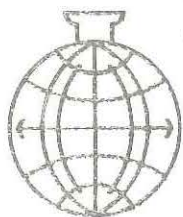
1. Prior to the adoption of EPA Form 8700-22 by the State of Michigan in 1984, IRDC used the State of Michigan manifest Form R 4896. Form R 4896 was used because the EPA Form 8700-22 was not available for use until its release later in 1984.

A letter from the Michigan DNR informed IRDC that EPA Form 8700-22 had been adopted by the State, due to its recent release for use under the uniform manifest concept. IRDC then ordered the EPA manifest from the Michigan DNR as requested and has been using this form since that date for all shipments of hazardous waste.

Therefore, IRDC was in compliance with the manifest requirements existing prior to release of the new EPA Form 8700-22 in 1984.

In reference to section 262.21, Michigan Form R 4896 states that when shipments of hazardous waste are sent to another state, there must be evidence that the TSDF is approved for hazardous waste, by the state receiving the shipments. In the alternative, a statement in the comments section of the manifest indicating the proper approval by the state receiving shipment is acceptable. Located on the Michigan manifest Form R 4896 is a TSDF certification paragraph which was signed by the TSDF accepting shipment from Triangle Resource Industries certifying that it was properly licensed by the state to which the shipments were sent. Information as to facility site identification number, address and transportation identification number appear on the Michigan Form R 4896.

XC: EPA 3/14/86



International Research and Development Corporation

March 12, 1986

MD 050 989 891
RECEIVED
MAR 14 1986
HMD - PLAINWELL

Mr. Chuck Bikfalvy
Environmental Quality Analyst
Department of Natural Resources
Hazardous Waste Division
Plainwell District
Box 355
Plainwell, Michigan 49080

Dear Mr. Bikfalvy:

On January 28, 1986, staff of the Department of Natural Resources (DNR) acting as representatives of the United States Environmental Protection Agency, conducted an inspection of the International Research and Development Corporation (IRDC). The inspection revealed observations concerning 40 CFR 262 which reclassified IRDC from a small quantity generator to a large quantity generator. Pursuant to your request in your letter of February 11, 1986, IRDC wishes to make the following response to your observations.

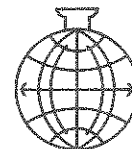
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XC: EPA 3/14/86



Mr. Bikfalvy
Page Two
March 12, 1986

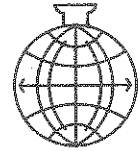
IRDC believes that this information which appears on the Michigan manifest supplies the information required by 40 CFR 262.21 which allows use of a generator's state's manifest where the state receiving the hazardous waste has no specific requirement for use of its form. As such, IRDC believes that it fully complied with instructions pertaining to use of Michigan Form R 4896 prior to adoption of the uniform manifest 8700-22. (Attachments 1, 2, 3, 4, 5).

2. IRDC has remedied this observation by clearly marking the date when the accumulation of hazardous waste begins. (Attachment 6).
3. IRDC has remedied this observation by using a label which clearly states the words "hazardous waste". (Attachment 6).
4. Employees who handle potentially hazardous waste generated by IRDC have been trained to follow general safety procedures utilized throughout the Company. These safety procedures include the wearing of protective clothing, gloves, respirator equipment, and eye protection at all times during the handling of potentially hazardous waste. The Company's safety committee also may be used to address potential problems which may affect health, safety and training of employees.

IRDC will submit 30 days from the date of this response, a program which will fulfill the provisions of 40 CFR 265.16.

5. IRDC will submit a contingency plan within 30 days of the date of this response.
6. The one drum of waste Xylene observed with the bung open has been closed and the appropriate personnel have been reinstructed pursuant to 40 CFR 265.173(a) that this and all containers of hazardous waste shall remain closed except to add or remove waste.
7. The manifest used in shipments involving Triangle Resource Industries show that IRDC received copies of the manifest from both the transporter and from the TSDF within a day or two following pick-up of the hazardous waste. These copies were then sent as required to the Michigan Department of Natural Resources, Environmental Services Division, P. O. Box 30038, Lansing, Michigan 48909. Therefore, the Michigan DNR should have received the appropriate copies within the period required. (Attachment 7).

Mr. Bikfalvy
Page Three
March 12, 1986



8. Hazardous waste is now being moved and stored in an area which has secondary containment. The appropriate technical standards are being reviewed to ensure that the containment area meets standards as required by the Michigan Act.

If you should have any questions or concerns regarding this correspondence, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in cursive script, appearing to read "Francis X. Wazeter, III".

Francis X. Wazeter, III, J.D.

FXWIII:cfs

Attachments

EPA

Newell Pangburn
International Research and Development
Page 2
February 11, 1986

6. One drum of waste xylene was stored with the bung open. This is a violation of 40 CFR 262.34(a) (1).

The facility was also in violation of Michigan's Act 64 as follows:

Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

1. Copies of manifests (Triangle Resource Industries) had not been mailed to the Department by the 10th of the month following the month of shipment in violation of Rule 304(4) (d).

February 11, 1986

2. Hazardous wastes were being accumulated in an area having no secondary containment in violation of Rule 518(X) which adopts EPA's 40 CFR 264.115. Standards for such containment are in 40 CFR 264.115.

Newell Pangburn, Director of Purchasing
International Research and Development, Incorporated
500 North Main
Mattawan, Michigan 49071

We request that you respond to this letter by March 14, 1986, indicating decisions and actions taken to correct violations. The Department of Natural Resources will forward your response to the United States Environmental Protection Agency with a recommendation regarding your facility's compliance status.

Re: EPA ID #MID050288091

Dear Mr. Pangburn:

On January 28, 1986, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located in Mattawan, Michigan, to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended; Michigan's Hazardous Waste Management Act (P.A. 64, 1979), as amended; and Michigan's Liquid Industrial Waste Hauling Act (P.A. 136, 1969), as amended.

As a result of that investigation, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that the facility is a generator of hazardous waste, but has not met 40 CFR 262 standards applicable to generators:

1. The facility did not use EPA form 8700-22 in manifesting hazardous wastes to Triangle Resource Industries. This is a violation of 40 CFR 262.20. Further, the manifest acquisition requirements of 40 CFR 262.21 were not followed for those shipments.
2. Containers of hazardous waste were not clearly marked with the dates the period of accumulation began. This is a violation of 40 CFR 262.34(a) (2).
3. Containers of hazardous waste were not clearly labeled with the words "hazardous waste." This is a violation of 40 CFR 262.34(a) (3).
4. The facility had no personnel training records as required by 40 CFR 262.34(a) (4).
5. The facility had no contingency plan as required by 40 CFR 262.34(a) (4).

continued...

RCRA Inspection Report

EPA Identification Number: M I D . 0 5 0 9 8 9 8 9 1Installation Name: INTERNATIONAL RESEARCH + DEVELOPMENT, INC.Location Address: 500 NORTH MAINCity: MATTAWANState: MI 49071Date of inspection: 1/28/86Time of inspection (from) 3:40 (to) 5:26

Person(s) interviewed

Title

Telephone

NEWELL DANGBURNDIR. OF PURCHASING(616) 668-3336TED PSZCZOLKOWSKIPLANT ENGINEER

Inspector(s)

Agency/Title

Telephone

CHUCK BIKEALYMIWR / EQA(616) 685-9886Installation Activity (mark only one box)Inspection Form(s)☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

GENERATOR OPERATING AS SQG - NARRATIVE
REPORT ATTACHED.

Plainwell District Headquarters

February 12, 1986

International Research and Development, Incorporated, File
EPA ID #MID050989891
Date of Inspection: 1/28/86

The facility has been operating as a small quantity generator based on its generation rate of spent xylene. As a result of a previous inspection (1/25/85), the facility was cautioned to accelerate its rate of waste removal in order to maintain hazardous waste accumulation at under the 1,000 kilogram exclusion level. An examination of the company's manifests reveals that caution was not heeded and as many as 8 barrels of waste xylene were accumulated before disposal. This clearly indicates accumulation of over 1,000 kilograms. Mr. Pangburn indicated that he was unable to obtain removal on a timely frequency because of the plant location and the unwillingness of haulers to pick up small loads of waste.

Further investigation revealed that the company generates additional wastes that it did not consider to be included in the hazardous waste category, yet was being shipped as flammable waste with a hazardous waste number of D001. This consists of rinsewaters from the emptying of laboratory glassware in which small amounts of spent solvents were contained. The company's characterization of the waste as flammable (therefore, automatically ignitable) is based on published flash points of the various solvents used in the laboratory and not on analysis of the aqueous waste mixtures. The company has not been managing these wastes as hazardous or including them in their quarterly determinations. As many as 40 drums of this waste were manifested to Triangle Resource Industries at one time. Clearly, the firm is subject to 40 CFR 262 as a generator. The facility is in violation of those standards in several respects:

1. Hazardous wastes were shipped with improper manifests. EPA form 8700-22 was not used, 262.20. Also, manifest acquisition requirements of 40 CFR 262.21 were not followed.
2. Containers of hazardous waste were not clearly marked with the accumulation starting date, 262.34(a)(2).
3. Containers of hazardous waste were not clearly labeled with the words "hazardous waste," 40 CFR 262.34(a)(3).
4. There were no personnel training records, 40 CFR 262.34(a)(4).
5. There was no contingency plan, 40 CFR 262.34(a)(4).
6. One drum of waste xylene was stored open, 40 CFR 262.34(a)(1).

The facility was also in violation of Michigan's Act 64 as follows:

--Containers of hazardous waste were being accumulated in an area lacking secondary containment.

--Copies of manifests (Triangle Resources Industries) had not been mailed to the Department by the 10th of the month following the month of shipment.

CB:ls

cc: Newell Pangburn
U.S. EPA - Region V
Facility File

6/4/84 ges Code 0

Location Address: Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

Date of Inspection: March 15, 1984

Person(s) interviewed

Newell Pangburn
International Research and Development Corporation
500 North Main
Mattawan, Michigan 49071

Re: EPA ID # - MID 050989891

Dear Mr. Pangburn:

On January 25, 1984, staff of the Department of Natural Resources conducted an investigation of your facility located in Mattawan, Michigan, to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended.

My inspection revealed that your facility was in compliance with RCRA at the time of the inspection. However, it was noted that your accumulation approaches the 1,000 kilogram exclusion level and pick-up may have to be accelerated in order to remain in compliance as a small quantity generator.

Enclosed is a copy of the inspection report for your information. If you have any questions regarding this matter, please feel free to contact me at (616) 685-9886.

Sincerely,

Chuck Bikfalvy

Chuck Bikfalvy, Water Quality Specialist
Hazardous Waste Division
Plainwell Compliance Section

CB:ls

Enclosure

cc: Bohunsky - HWD
U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number: M I D 050989891

Installation Name: INTERNATIONAL RESEARCH AND DEVELOPMENT CORP.

Location Address: 500 NORTH MAIN

City: MATTAWAN

State: MICH. 49071

Date of inspection: 1/25/84

Time of inspection (from) 10:50 (to) 11:40

Person(s) interviewed

Title

Telephone

NEWELL PANGBURN

PURCHASING MGR.

(616) 668-3336

Inspector(s)

Agency/Title

Telephone

C. BIKFALVY

MDNR / WATER QUALITY
SPECIALIST

(616) 685-9886

Installation Activity (mark only one box)

Inspection Form(s)

☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

FOLLOW - UP INSPECTION. WASTE XYLENE (FOO3) WAS DISPOSED OF
ON 11/03/83. MANIFEST PROPERLY COMPLETED. SINCE THEN HAS
BEEN OPERATING AS SQG. WASTE NOW ACCUMULATED IN DRUMS
AND PICKED UP REGULARLY (EVERY 3 MONTHS) BY TRIANGLE RESOURCE
INDUSTRIES. PICKUP MAY NEED TO BE ACCELERATED TO
AVOID EXCEEDING 1000 KG ACCUMULATION.

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15
M I D O 4 8 9 8 9 8 9 1
T/A C

This Installation's Non-Regulated Status is Expected to Apply:

- ☐ For 1983 Only ☒ Permanently
☐ Other _____

III. NAME OF INSTALLATION

30 INTERNATIONAL RESEARCH & DEVELOPMENT CORP. 69

IV. INSTALLATION MAILING ADDRESS

15 16 500 NORTH MAIN ST 45
Street or P.O. Box
15 16 MATTAWAN MI 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 N/A 45
Street or Route number
15 16 N/A 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

15 16 PANGBURN NEWELL 45
Name (last and first)
46 616-668-3336 55
Phone No. (area code & no.)

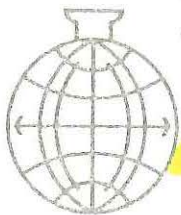
VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NEWELL PANGBURN PUR. MGR. 2/27/84
Print/Type Name Title Signature of Authorized Representative Date Signed

~~Inspection Code = 1~~
Enforcement Code =
2-17-84
AK

MID 048989891



International Research
and Development Corporation

RECEIVED

OCT 24 1983

WATER QUALITY DIV.
DIST. 1

October 19, 1983

Department of Natural Resources
Hazardous Waste Division
9311 Groh Road
Grosse Ile, MI 48138

ATTEN: Chuck Bikfalvy
Water Quality Specialist

Dear Mr. Bikfalvy:

This is a response to your letter dated September 29, 1983 requesting a report from us detailing actions taken to correct the violations noted therein.


We have ceased adding xylene to the underground storage tank. It is now being accumulated in a 55 gallon metal drum for later recycling.

We have communicated several times with Mr. Larry Charkowski of Thomas Solvents. Thomas Solvents has offered to purchase the xylene from us pending the result of a new sample analysis. The sample was given to Mr. Charkowski on October 12, 1983 and we expect to hear from him shortly. A second company, Fisher Calo, Inc., also expressed interest in purchasing the xylene. These companies would empty the underground storage tank for us.

Our company is listed with the Environmental Protection Agency as Non Regulated Generator under the status of a "Small Quantity Generator" (less than 1,000kg a month). We do not intend to store materials listed as hazardous wastes by the E.P.A. for more than 90 days. Once we have disposed of our present hazardous wastes, I believe our company will be in compliance with your regulations. I am personally confident that this will be accomplished within the next few weeks. I will confirm this in writing when it occurs.

If there are any questions relative to the above actions please do not hesitate to call me.

Sincerely,


Newell Pangburn
Purchasing Manager

XC: Dr. Phillips

9ES
10-24-83
Status 5
code 7

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028

LANSING, MI 48909

HOWARD A. TANNER, Director

Hazardous Waste Division

9311 Groh Road

Grosse Ile, Michigan 48138

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

September 29, 1983

Newell S. Pangburn, Purchasing Mgr.
International Research & Development Corp.
500 North Main
Mattawan, MI 49071

MID 048 989 891

Dear Mr. Pangburn:

On September 20, 1983 I inspected your facility for compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended, and Michigans Act 64, P.A. of 1979, as amended. A copy of my inspection report is enclosed.

Your facility is a generator of waste xylene subject to the requirements of 40 CFR part 262. You are not in compliance with those regulations, however. Deficiencies are identified as follows:

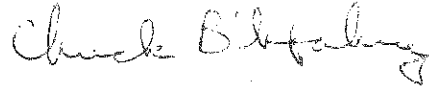
1. Waste being accumulated in your underground storage tank have been stored for more than 90 days. Since your plant does not have Interim status as a storage facility this is a violation of 262.34.
2. Compliance with 40 CFR Subpart J is required by 262.34 (a) (1). Your storage tank is not in compliance with these regulations in the following respects:
 - a. The tank is not clearly labeled with the words "Hazardous Waste", in accordance with 262.34 (a) (3).
 - b. Required daily and weekly inspections are not performed as required by 265.194.
3. 262.34 (a) (4) requires compliance with 265 Subpart D and with 265.16. You have complied with neither in that you lack the required contingency plan (265 Subpart D) and the required training program and records (265.16).
4. In addition to the above federal requirements, Rule 299,6703 of Michigans Act 64 cited above requires that adequate secondary containment and a leachate collection and withdrawl system be provided. You are subject to this rule as a user of underground short-term storage of liquids. Your facility is in violation of that rule.

Newell S. Pangburn

Page 2

Please respond in writing by October 21, 1983 detailing actions taken to correct the violations noted above. In the meantime, if you have any questions pertaining to this inspection, please do not hesitate to call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chuck Bikfalvy".

Chuck Bikfalvy
Water Quality Specialist
Compliance Section
Hazardous Waste Division

CB/lm

cc: Tom Leep

EPA

Division file

District file

RCRA Inspection Report

EPA Identification Number: M I D 0 5 0 9 8 9 8 9 1

Installation Name: INTERNATIONAL RESEARCH + DEVELOPMENT CORP

Location Address: 500 NORTH MAIN

City: MATTAWAN

State: MICH 49071

Date of inspection: 9/20/83

Time of inspection (from) 12:50 (to) 2:55

Person(s) interviewed

Title

Telephone

BARRIE PHILLIPS

DIR. OF ADMIN. SVCS.

(616) 668-3336

✓ NEWELL S. PANGBURN, GPM.

PURCHASING MGR.

" " "

Inspector(s)

Agency/Title

Telephone

C. BIKFALVY

MDNR/WATER QUALITY
SPECIALIST

(313) 675-0860

Installation Activity (mark only one box)

Inspection Form(s)

☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☒ Generation only

B

☐ Transportation only

C

ALMOST PURE XYLENE IS ACCUMULATED FOR RECYCLING IN 6000 GALLON
TANK, WILL BE SOLD, ~~BEHIND THE~~ SUBJECT TO REGULATION
BECAUSE IT IS A SUBPART D. LISTED WASTE. COMPANY
HAS NOT FILED PART A APPLICATION, HAS NOT COMPLIED
WITH 40 CFR PART 262.

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40		✓		NO WASTE MANIFESTED TO DATE
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. _____				
(3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements)				
a. Manifest document number?				
b. Name, mailing address, telephone number, and EPA ID number of generator?				
c. Name and EPA ID number of transporter(s)?				
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?				
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
f. The total quantity of waste(s) and the type and number of containers loaded?				
g. Required certification?				
h. Required signatures?				
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. _____				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____				

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	_____	_____	_____	NO WASTE SHIPPED TO DATE
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	_____	_____	_____	_____
(3) If required, are placards available to transporter? 262.33	_____	_____	_____	_____

** (4) Pre-shipment Accumulation:

** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	_____	_____	_____	_____
i. Is each container clearly marked with the date on which the period of accumulation began?	_____	_____	_____	_____
ii. Have more than 90 days elapsed since the dates marked?	_____	_____	_____	_____
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	_____	_____	_____	_____
iv. Are containers in good condition?	_____	_____	_____	_____
v. Are containers compatible with waste in them?	_____	_____	_____	_____
vi. Are containers managed to prevent leaks?	_____	_____	_____	_____
vii. Are containers stored closed?	_____	_____	_____	_____
viii. Are containers inspected weekly for leaks and defects?	_____	_____	_____	_____
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	_____	_____	_____	_____

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				
b. Is hazardous waste accumulated in tanks? If no, skip to c. 265.34 (January 11, 1982 revision)	✓			
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 265.34 (January 1982 revision)		✓		NA
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	✓			
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?			✓	NA - COVERED
iv. Do continuous feed systems have a waste-feed cutoff?			✓	NO CONT. FEED SYSTEM
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193			✓	NA - SAME WASTE USED
vi. Are required daily and weekly inspections done? 265.194		✓		
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198	✓			IGNITABLE
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199			✓	NA

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers? ✓

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

✓ NO TRAINING PROGRAM

- i. Job Titles? _____
- ii. Job Descriptions? _____
- iii. Description of training? _____
- iv. Records of training? _____
- v. Did personnel receive the required training by 5-19-81? _____
- vi. Do new personnel receive required training within six months? _____
- vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? _____

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 264.31

✓

ii. If required, does this facility have the following equipment: 264.32

Internal communications or alarm systems? ☒ ☐ ☐ ☐

Telephone or 2-way Radios at the scene of operations? ☒ ☐ ☐ ☐

Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? ☒ ☐ ☐ ☐

Indicate the volume of water and/or foam available for fire control:

CITY WATER SUPPLY

iii. Testing and Maintenance of Emergency Equipment: 264.33

Has the owner or operator established testing and maintenance procedures for emergency equipment? ☒ ☐ ☐ ☐

Is emergency equipment maintained in operable condition? ☒ ☐ ☐ ☐

iv. Has owner/operator provided immediate access to internal alarms (if needed)? ☒ ☐ ☐ ☐

v. Is there adequate aisle space for unobstructed movement? ☒ ☐ ☐ ☐

vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? ☐ ☐ ☐ ☐

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52 ☐ ☐ ☐ ☐

☒ NO CONTINGENCY PLAN

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	_____	_____	_____	_____
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	_____	_____	_____	_____
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	_____	_____	_____	_____
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	_____	_____	_____	_____
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	_____	_____	_____	_____
vii. Is the facility emergency coordinator identified?	_____	_____	_____	_____
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	_____	_____	_____	_____
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____	_____	_____
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	_____	_____	_____	_____

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)

262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

_____ ☒ _____

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing?

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

iii. Met the Manifest requirements?

b. Importing Hazardous Waste, has the generator met the manifest requirements?

Remarks:

COMPANY HAS NOTIFIED AS A GENERATOR BUT
HAS BEEN ACCUMULATING (STORING) WASTE XYLENE
IN A 6000 GALLON UNDERGROUND TANK PENDING
SALE OF WASTE FOR RECYCLING. HAVE NOT RILED
PART A. HAVE NOT MET REQUIREMENTS OF PART 262.
INTEND TO DISPOSE OF WASTE AND WILL SUBSEQUENTLY
OPERATE AS SMALL QUANTITY GENERATOR



SEP 28 1982

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION V

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

FILE COPY

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

PANGBURN NEWELL PURCHASING MGR
INTERNATIONAL RESEARCH & DEVELOPMENT
3500 N MAIN ST
MATTAWAN MI 49071
FACILITY: 500 N MAIN ST
LOCATION: MATTAWAN MI 49071
ID NO.: MID048989891

RE: TSD Notification without
Part A Application

Dear Notifier:

The United States Environmental Protection Agency (U.S. EPA) has received your notification of hazardous waste activity. On that form, by checking the "treat/store/dispose" (TSD) box, you indicated that you are a hazardous waste management facility (HWMF). To date, however, we have no record of having received Part A application for a hazardous waste permit which is required for all HWMFs.

Federal regulations require owners and operators of existing HWMFs (installations which treat, store, or dispose of hazardous waste) to have submitted a Part A permit application to the Regional Administrator by November 19, 1980, in accordance with 40 CFR 122.22. This requirement applied to HWMFs which were in existence on or before November 19, 1980. New facilities (those established after November 19, 1980) are required to submit Part A and Part B of their permit application, and receive a Resource Conservation and Recovery Act (RCRA) permit before beginning physical construction.

If your facility treats, stores, or disposes of hazardous waste, then your facility is operating without a hazardous waste permit, in violation of Section 3005 of RCRA, as amended. This violation is considered serious by the U.S. EPA, and may subject you to Federal enforcement under Section 3008 of RCRA for past and continued non-compliance.

Please submit your completed Part A application to the address below within fifteen days of receipt of this letter:

RCRA ACTIVITIES
P. O. Box A3587
Chicago, Illinois 60690-3587

We are aware that some hazardous waste handlers may have marked the TSD box on the notification form as a precaution or as a result of misunderstanding the May 19, 1980, hazardous waste regulations. If you notified us as a TSD in error, or if your status as a treatment, storage, or disposal facility has changed, please advise us in writing immediately.

Please contact Arthur Kawatachi of my staff at (312) 353-2197, if you have any questions regarding this letter.

Sincerely yours,

William H. Miner, Jr.
Karl J. Klepitsch, Jr., Chief
Waste Management Branch



INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

CONTINUE ON REVERSE

5	W	M	I	D	0	4	8	9	8	9	8	9	1	2	1
1	2												13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 2	F 0 0 3	F 0 0 5			
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

N O N E	13	14	15	16	17	18
	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
	19	20	21	22	23	24
	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
	25	26	27	28	29	30
	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 0 2	U 1 1 2	U 1 1 7	U 1 2 2	U 1 2 3	U 2 3 9
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
U 0 4 4	U 2 2 0				
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

NONE	49	50	51	52	53	54
	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)


☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE (type or print)	DATE SIGNED
	Newell Pangburn	10/27/81

EPA Form 8700-12 (6-80) REVERSE

Purchasing Manager

RECEIVED
OCT 29 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V



International Research
and Development Corporation

October 27, 1981

RCRA Activities
Region V
P. O. Box A 3587
Chicago, Illinois 60690-3587

To Whom It May Concern:

Enclosed is our completed "Form 8700-12, Notification of Hazardous Waste Activity". We have saved some drums of a weak solution of formaldehyde. A "Generator Number" is needed in order to have them picked up by a waste disposal service.

Please expedite this request. We would like to accomplish disposal before winter starts.

Thank you for your consideration.

Very truly yours,


Newell Pangburn
Purchasing Manager

NP:jt

Enclosure



OCT 29 1981

RECEIVED

OCT 29 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MID048989891

INSTALLATION ADDRESS

INTERNATIONAL RESEARCH AND DEVELOPMENT
3500 N MAIN ST
MATTAWAN MI 49071
5500 NORTH MAIN ST
MATTAWAN MI 49071

EPA Form 8700-12B (4-80)

12/15/81



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MID048999981

REACKNOWLEDGEMENT

INSTALLATION ADDRESS

INTERVALE STEEL DIV OF BARRY STEEL COR
7007 INTERVALE AVE
DETROIT MI 48238
7007 INTERVALE AVE
DETROIT MI 48238

EPA Form 8700-12B (4-80)

09/28/81